



AUG 02 2011

Douglas Findley
Land O' Lakes, Inc
400 South "M" Street
Tulare, CA 93274

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: S-1110561

Dear Mr. Findley:

Enclosed for your review and comment is the District's analysis of Land O' Lakes, Inc's application for Emission Reduction Credits (ERCs) resulting from the shut-down of a whey dryer, at 400 South M Street in Tulare. The quantity of ERCs proposed for banking is 2,339 lb·NOx/year, 113 lb·SOx/year, 2,706 lb·PM10/year, 13,183 lb·CO/year and 214 lb·VOC/year.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Steve Roeder of Permit Services at (661) 392-5615.

Sincerely,

David Warner
Director of Permit Services

DW:SR/cm

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
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Southern Region
34946 Flyover Court
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AUG 02 2011

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: S-1110561

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Land O' Lakes, Inc's application for Emission Reduction Credits (ERCs) resulting from the shut-down of a whey dryer, at 400 South M Street in Tulare. The quantity of ERCs proposed for banking is 2,339 lb·NOx/year, 113 lb·SOx/year, 2,706 lb·PM10/year, 13,183 lb·CO/year and 214 lb·VOC/year.

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AUG 02 2011

Gerardo C. Rios (AIR 3)
Chief, Permits Office
Air Division
U.S. E.P.A. - Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: S-1110561

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Land O' Lakes, Inc's application for Emission Reduction Credits (ERCs) resulting from the shut-down of a whey dryer, at 400 South M Street in Tulare. The quantity of ERCs proposed for banking is 2,339 lb·NOx/year, 113 lb·SOx/year, 2,706 lb·PM10/year, 13,183 lb·CO/year and 214 lb·VOC/year.

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Bakersfield Californian
Bakersfield Californian

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to Land O' Lakes, Inc for the shut-down of a whey dryer, at 400 South M Street in Tulare. The quantity of ERCs proposed for banking is 2,339 lb·NOx/year, 113 lb·SOx/year, 2,706 lb·PM10/year, 13,183 lb·CO/year and 214 lb·VOC/year.

The analysis of the regulatory basis for this proposed action, Project #S-1110561, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, REGION'S ADDRESS.**

**San Joaquin Valley Air Pollution Control District
ERC Application Review
Shutdown of Whey Dryer**

Facility Name: Land O' Lakes, Inc
Mailing Address: 400 South M Street
Tulare, CA 93274

Date: July 19, 2011
Engineer: Steve Roeder
Lead Engineer: Steve Leonard

Contact Person: Douglas Findley, Environmental Engineer
Telephone: (559) 687-6653

Facility ID: S-525
Project #: S-1110561
Submitted: February 23, 2011

Deemed Complete: April 14, 2011

I. Summary

The primary business of Land O' Lakes is the manufacturing, storage and bagging of dry milk-base products, such as dried milk and non-fat milk powder and whey powder.

Land O' Lakes has decided to discontinue making whey powder and therefore has shut down their 12 MMBtu/hr whey spray dryer #5, and surrendered Permit to Operate (PTO) S-525-10. See surrendered operating permit in Appendix A. While the permit S-525-10 refers to the equipment as a milk-spray dryer, the dryer's actual specific purpose was a whey dryer. See the list of dryers and their functions as submitted for Project 1080231 by Trinity Consultants in Appendix B.

The whey dryer was specifically designed to dry whey, and no other dryers at the facility are capable of producing whey powder. The entire whey processing operation has been shut down. Therefore the emission reductions resulting from the shutdown of the equipment are expected to be real and permanent.

The following emission reductions have been found to qualify for ERC banking. See Calculation Section below.

Bankable Emissions Reductions Credits (lb/Quarter)					
	NO _x	SO _x	PM10	CO	VOC
1st Quarter	618	30	711	3,485	57
2nd Quarter	473	23	455	2,668	43
3rd Quarter	646	31	821	3,640	59
4th Quarter	602	29	719	3,390	55

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (12/18/08)
Rule 2301	Emission Reduction Credit Banking (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4202	Particulate Matter - Emission Rate (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4309	Dryers, Dehydrators and Ovens (12/15/05)

III. Location of Reduction

Land O' Lakes is located at 400 South M Street in Tulare.

IV. Method of Generating Reductions

The method of emission reductions is the permanent shut down of unit S-525-10. This was a whey spray dryer served by a baghouse. Land O' Lakes has discontinued producing whey powder, the equipment is no longer necessary and the permit has been surrendered. The permit was cancelled on 12/21/10 pursuant to the request from the facility dated 12/16/10.

V. Calculations

A. Assumptions

- PM₁₀ emissions are based on the throughput of product
- PM₁₀ emissions from the combustion of gas are combined with the emissions of whey from the baghouse for an overall PM₁₀ emission factor
- All other emissions are based on fuel usage
- Since the dryer passed the last source test on 11/24/08, source-test data is used for NO_x and CO emissions (See Appendix C)
- Maximum whey production = 72 tons per day
- Dryer was fired exclusively on PUC grade natural gas
- A baghouse was used for PM₁₀ control
- HHV of PUC natural gas is 1,000 Btu/scf (District Policy APR 1720)
- F-factor of natural gas = 8,710 scf per MMBtu (District Emissions Calculator)

B. Emission Factors

- PM₁₀ emissions = 0.44 pounds per ton of product (Permit to Operate limit)
- NO_x emissions = 3.5 ppmv @ 19% O₂ (Permit to Operate limit)
- NO_x emissions = 0.060 lb/MMBtu (Source test data in Appendix C)
- SO_x emissions = 0.00285 lb/MMBtu (District Policy APR 1720)
- CO emissions = 42 ppmv @ 19% O₂ (Permit to Operate limit)
- CO emissions = 0.338 lb/MMBtu (Source Test Data in Appendix C)
- VOC emissions = 0.0055 lb/MMBtu (Permit to Operate)

C. Baseline Period Determination

Pursuant to Section 3.9 of Rule 2201, the Baseline Period is a period of time equal to either:

3.9.1 The two consecutive years of operation immediately prior to the submission date of the Complete Application; or

3.9.2 At least two consecutive years within the five years immediately prior to the submission date of the Complete Application if determined by the APCO as more representative of normal source operation.

The applicant requested that the permit be cancelled on 12/16/10. Normally, the baseline period would be the two consecutive years immediately prior to this date. However, the applicant has claimed that the two consecutive years of operation prior to shutdown are not representative of Normal Source Operation (NSO) as the dryer had several months of downtime in this time period.

While the permit was cancelled in December 2010, operation decreased considerably in August 2010 and the equipment remained idle after that until the permit was finally cancelled. Therefore the period from August 2010 through December 2010 will be excluded in determining NSO.

To determine what period (of at least two years) during the past five years is representative of NSO, emission inventory statements from 1999 through 2005 and fuel-use data from 2006 through July 2010 were used, and the average monthly fuel use over this period was determined to be NSO. Please see the NSO Determination in Appendix F.

Next, the average monthly fuel use for every consecutive 24, 36, 48 and 60-month period during the past 5-years was determined*. The average monthly fuel use for each of these periods was then compared to the NSO average monthly fuel use. The period for which the average monthly fuel use most closely matched the NSO fuel use is the Baseline Period.

*Please note that since the equipment did not operate for 60 months during the past 5 years, a 60-month average was not determined.

As specified in the *Baseline Period Determination* in Appendix G, the Baseline Period for this ERC project is the 24 month period from July 2008 thru June 2010.

D. Baseline Data

The baseline fuel use data is taken from the fuel use and production records in Appendix D. The two entries for each month are added together as a monthly total. Then the monthly totals are added together for each of the 4 calendar quarters, and divided by 2 years in order to show the Quarterly Average.

Monthly Baseline Fuel-Use in SCF					
Month	2008	2009	2010	Monthly Total	Quarterly Average
Jan		4,309,838	3,590,337	7,900,175	
Feb		3,678,465	3,890,562	7,569,027	
Mar		4,528,682	2,912,581	7,441,263	11,455,233
Apr		2,085,555	3,833,216	5,918,771	
May		3,022,214	2,528,303	5,550,517	
Jun		3,539,175	2,528,584	6,067,759	8,768,524
Jul	4,232,550	3,433,151		7,665,701	
Aug	4,331,975	4,008,816		8,340,791	
Sep	4,397,966	3,527,368		7,925,334	11,965,913
Oct	4,076,376	3,533,553		7,609,929	
Nov	3,926,826	2,248,599		6,175,425	
Dec	4,649,559	3,854,299		8,503,858	11,144,606

The baseline whey production data is taken from the fuel use and production records in Appendix D (in lbs), totaled for each month, averaged for each quarter as described above, and divided into tons per quarter in the following table.

Monthly Baseline Whey Production in lbs/Month						
Month	2008	2009	2010	Monthly Total	Quarterly Average	Tons per Quarter
Jan		1,605,000	1,043,382	2,648,382		
Feb		1,214,550	1,105,993	2,320,543		
Mar		1,342,500	871,809	2,214,309	3,591,617	1,795.81
Apr		291,000	1,165,517	1,456,517		
May		776,250	720,077	1,496,327		
Jun		889,500	754,524	1,644,024	2,298,434	1,149.22
Jul	1,521,000	1,156,500		2,677,500		
Aug	1,491,500	1,267,272		2,758,772		
Sep	1,647,000	1,204,750		2,851,750	4,144,011	2,072.01
Oct	1,120,500	1,190,250		2,310,750		
Nov	1,406,250	640,500		2,046,750		
Dec	1,495,500	1,412,250		2,907,750	3,632,625	1,816.31

E. Historical Actual Emissions (HAE)

1. HAE from Fuel Use

The HAE for the dryer burner are determined by multiplying the quarterly fuel use by the emission factors presented above. The emissions for PM₁₀ are not included here, because the burner PM₁₀ emissions are included in the baghouse emissions, which are calculated separately below.

HAE from Fuel Use Quarter 1						
NO _x	0.060	lb/MMBtu x	11,455.2	MMBtu/qtr =	687	lb/qtr
SO _x	0.00285	lb/MMBtu x	11,455.2	MMBtu/qtr =	33	lb/qtr
CO	0.338	lb/MMBtu x	11,455.2	MMBtu/qtr =	3,872	lb/qtr
VOC	0.0055	lb/MMBtu x	11,455.2	MMBtu/qtr =	63	lb/qtr
HAE from Fuel Use Quarter 2						
NO _x	0.060	lb/MMBtu x	8,768.5	MMBtu/qtr =	526	lb/qtr
SO _x	0.00285	lb/MMBtu x	8,768.5	MMBtu/qtr =	25	lb/qtr
CO	0.338	lb/MMBtu x	8,768.5	MMBtu/qtr =	2,964	lb/qtr
VOC	0.0055	lb/MMBtu x	8,768.5	MMBtu/qtr =	48	lb/qtr
HAE from Fuel Use Quarter 3						
NO _x	0.060	lb/MMBtu x	11,965.9	MMBtu/qtr =	718	lb/qtr
SO _x	0.00285	lb/MMBtu x	11,965.9	MMBtu/qtr =	34	lb/qtr
CO	0.338	lb/MMBtu x	11,965.9	MMBtu/qtr =	4,044	lb/qtr
VOC	0.0055	lb/MMBtu x	11,965.9	MMBtu/qtr =	66	lb/qtr
HAE from Fuel Use Quarter 4						
NO _x	0.060	lb/MMBtu x	11,144.6	MMBtu/qtr =	669	lb/qtr
SO _x	0.00285	lb/MMBtu x	11,144.6	MMBtu/qtr =	32	lb/qtr
CO	0.338	lb/MMBtu x	11,144.6	MMBtu/qtr =	3,767	lb/qtr
VOC	0.0055	lb/MMBtu x	11,144.6	MMBtu/qtr =	61	lb/qtr

2. HAE from Whey Production

The HAE for dryer PM₁₀ emissions from the production of whey powder are determined by multiplying the quarterly whey production records by the PM₁₀ emission factor presented above.

HAE from Production Quarter 1						
PM ₁₀	0.44	lb/ton	1,795.81	ton/qtr =	790	lb/qtr
HAE from Production Quarter 2						
PM ₁₀	0.44	lb/ton	1,149.22	ton/qtr =	506	lb/qtr
HAE from Production Quarter 3						
PM ₁₀	0.44	lb/ton	2,072.01	ton/qtr =	912	lb/qtr
HAE from Production Quarter 4						
PM ₁₀	0.44	lb/ton	1,816.31	ton/qtr =	799	lb/qtr

3. HAE TOTAL

The quarterly emissions presented in the two tables above are added together in the following table to produce the grand quarterly HAE.

Total HAE in Lb/Qtr	
Quarter 1	
NO _x	687
SO _x	33
PM ₁₀	790
CO	3,872
VOC	63
Quarter 2	
NO _x	526
SO _x	25
PM ₁₀	506
CO	2,964
VOC	48
Quarter 3	
NO _x	718
SO _x	34
PM ₁₀	912
CO	4,044
VOC	66
Quarter 4	
NO _x	669
SO _x	32
PM ₁₀	799
CO	3,767
VOC	61

F. Adjustments to HAE

1. Rule 2201 - New and Modified Stationary Source Review Rule

Pursuant to Section 3.22, Historical Actual Emissions must be discounted for any emissions reduction which is:

- required or encumbered by any laws, rules, regulations, agreements, orders, or
- attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or
- proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.
- Any Actual Emissions in excess of those required or encumbered by any laws, rules, regulations, orders, or permits. For units covered by a Specific Limiting Condition (SLC), the total overall HAE for all units covered by SLC must be discounted for any emissions in excess of that allowed by the SLC.

- a. There are no agreements or orders regarding the operation or emissions reductions associated with the dryer. The discounts for any Rules will be discussed under the applicable Rules listed below. Therefore, no adjustments will be made to the HAE under this section.
- b. There are reductions from the dryers that are attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan. Therefore, no adjustment to the HAE will be made in this section.
- c. There are no reductions for dryers proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act. Therefore, no adjustments will be made to the HAE under this section.
- d. There are no SLCs related to the operation of the dryer. The emissions were taken from the permit limits or lower (source test results). Any adjustments to be made for any Rules will be addressed under the applicable Rules listed below. In addition, the fuel-use or whey production did not exceed the permitted maximum daily use (full time for fuel use, and 72 tons per day)) for any month represented. Therefore, no adjustments will be made to the HAE under this section.

The dryer has undergone permitting under Rule 2201 and EPA review under a minor modification. The permit complies with all NSR requirements and Federal Requirements. No adjustments to the HAE are required under Rule 2201.

2. Rule 4201 - Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

The particulate matter concentration is calculated as follows.

Assumptions

- F-Factor for natural gas 8,710 dscf/MMBtu
- PM₁₀ Emission Factor 0.44 lb/ton of product
- Percentage of PM as PM₁₀ in Exhaust 100%
- Exhaust Oxygen (O₂) Concentration 19%
- Excess Air Correction Factor = $\frac{20.9\%}{(20.9-19)\%} = 12.87$
- Being conservative, it is assumed that no additional air was added to the exhaust airflow beyond the 19% O₂ which is standard with dryers.
- The highest number of tons processed compared to the number of Btus burned in any one month occurred in September of 2008. An average of 0.3745 lb of product were produced while burning each scf of gas. Therefore this figure will serve as the conservative ratio to which the grain loading limit will be compared.

$$\frac{0.3745 \text{ lb}}{\text{scf}} \times \frac{1 \text{ scf}}{1,000 \text{ Btu}} \times \frac{1,000,000}{\text{MM}} = 374.5 \frac{\text{lb}}{\text{MMBtu}}$$

$$\frac{375 \text{ lb} \cdot \text{PM}}{\text{MMBtu}} \times \frac{1 \text{ ton}}{2,000 \text{ lb}} \times \frac{0.44 \text{ lb}}{\text{ton}} = 0.083 \frac{\text{lb} \cdot \text{PM}}{\text{MMBtu}}$$

$$\text{Grain Loading} = \frac{\left(\frac{0.083 \text{ lb} \cdot \text{PM}}{\text{MMBtu}} \times \frac{7,000 \text{ grain}}{\text{lb} \cdot \text{PM}} \right)}{\left(\frac{8,710 \text{ ft}^3}{\text{MMBtu}} \times 12.87 \right)} = 0.0052 \frac{\text{grain}}{\text{ft}^3}$$

Since 0.0052 grain·PM₁₀/scf is less than 0.1 grain·PM₁₀/scf, no adjustment is necessary for Rule 4201.

3. Rule 4202 - Particulate Matter Emission Rate

Rule 4202 states that a person shall not discharge into the atmosphere from any source operation, particulate matter in excess of that allowed by the Rule 4202 process weight tables.

The permit limited the production rate to 72 tons per day, which, conservatively based on a 24-hour day, is 3 tons per hour. The production rate of 3 tons per hour is not specifically listed on the table. However, a more conservative figure of 2.5 tons per hour is, and the corresponding allowable emission rate is 6.43 lb·PM/hour.

Based on the emission factor which is 0.44 lb·PM₁₀/ton of product, the emissions are:

$$\frac{0.44 \text{ lb} \cdot \text{PM}}{\text{ton}} \times \frac{72 \text{ ton}}{24 \text{ hour}} = 1.32 \frac{\text{lb} \cdot \text{PM}}{\text{hour}}$$

Since 1.32 lb·PM/hour is less than 6.43 lb·PM/hour, no adjustment to the HAE is necessary for Rule 4202.

4. Rule 4301 - Fuel Burning Equipment

Rule 4301 limits the emission of air contaminants from fuel burning equipment

Pursuant to Section 3.1, *Fuel Burning Equipment* is any furnace, boiler, apparatus, stack, and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by *indirect heat transfer*.

Since whey dryers operate by direct heat transfer, this Rule is not applicable to the whey dryer.

5. Rule 4309 - Dryers, Dehydrators and Ovens

The purpose of Rule 4309 is to limit emissions of NO_x and CO from dryers, dehydrators, and ovens.

Section 5, Table 1 limits NO_x and CO emissions to 3.5 and 42 ppmv, respectively, at 19% O₂. According to the source test results in Appendix C, upon which the HAE is based, the emissions from this unit are 3.0 and 27.7 ppmv of NO_x and CO, respectively at 19.8% O₂. Please note that according to Rule 4309, no adjustments are made for excess air above 19% O₂. Since the tested emissions are lower than the Rule 4309 limits, no adjustment is necessary for Rule 4309.

6. Actual Emissions Reductions (AER)

Since no adjustments have been to the HAE, the AER is the same as the HAE posted in Section V.E above.

7. Air Quality Improvement Deduction (AQID)

Pursuant to Rule 2201 Section 3.5, the AQID is a 10% discount factor applied to AER before the AER is eligible for banking.

The HAE is adjusted for the AQID in the following table.

Total HAE in Lb/Qtr			
Quarter 1			
Pollutant	HAE	AQID	Remainder
NO _x	687	68.7	618
SO _x	33	3.3	30
PM ₁₀	790	79	711
CO	3,872	387.2	3,485
VOC	63	6.3	57
Quarter 2			
Pollutant	HAE	AQID	Remainder
NO _x	526	52.6	473
SO _x	25	2.5	23
PM ₁₀	506	50.6	455
CO	2,964	296.4	2,668
VOC	48	4.8	43
Quarter 3			
Pollutant	HAE	AQID	Remainder
NO _x	718	71.8	646
SO _x	34	3.4	31
PM ₁₀	912	91.2	821
CO	4,044	404.4	3,640
VOC	66	6.6	59

Quarter 4			
Pollutant	HAE	AQID	Remainder
NO _x	669	66.9	602
SO _x	32	3.2	29
PM ₁₀	799	79.9	719
CO	3,767	376.7	3,390
VOC	61	6.1	55

8. Increase in Permitted Emissions (IPE)

All of the whey drying equipment has been shut down, and there are no other dryers at the facility that are capable of drying whey. Therefore, there is no increase in emissions associated with this project, and no adjustment to the HAE for IPE purposes is necessary.

9. Bankable Emissions Reduction Credits

The bankable ERCs are posted in the following table for each quarter of the year.

Bankable ERCs in Lb/Qtr	
Quarter 1	
NO _x	618
SO _x	30
PM ₁₀	711
CO	3,485
VOC	57
Quarter 2	
NO _x	473
SO _x	23
PM ₁₀	455
CO	2,668
VOC	43
Quarter 3	
NO _x	646
SO _x	31
PM ₁₀	821
CO	3,640
VOC	59
Quarter 4	
NO _x	602
SO _x	29
PM ₁₀	719
CO	3,390
VOC	55

VI. Compliance

Rule 2201 - New and Modified Stationary Source Review Rule

To comply with the definition of AER (Section 3.2.1), the reductions must be real, enforceable, quantifiable, permanent, and surplus.

A. Real

The emissions reductions were generated by the shutdown of a whey dryer. The emissions reductions were calculated from actual historic data and recognized emission factors and source test data. The associated permit for this unit has been surrendered to the District. Therefore, the emission reductions are real.

B. Enforceable

The PTO for dryer #5 (S-0525-10) has been surrendered. Operation of the equipment without a valid permit would subject the permittee to enforcement action, and this facility is subject to annual inspections. Therefore, the reductions are enforceable.

C. Quantifiable

The reductions are quantifiable since they were calculated from historic production and fuel use data, source testing data, established and accepted emission factors, permitted limits, and methods according to District Rule 2201. Therefore, the reductions are quantifiable and have been quantified.

D. Permanent

The applicant states that Land O' Lakes no longer produces any whey powder and there is no other dryer at the facility is capable of drying whey. Since the equipment has been shut down and the permit surrendered, and no other equipment is capable of, or expected to produce whey, the reductions are permanent.

E. Surplus

To be considered surplus, AER shall be in excess, at the time the application for an Emission Reduction Credit is deemed complete, of any emissions reduction which:

- Is required or encumbered by any laws, rules, regulations, agreements, orders, or
- Is attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or
- Is proposed in the adopted air quality plan pursuant to the California Clean Air Act.

As discussed in Section V.F.1 above, there are no rules, regulations, plans, etc., that would serve to reduce the HAE. Therefore the reductions are surplus.

F. Not used for the Approval of an Authority to Construct or as Offsets

The emission reduction credits generated by the shutdown of the whey dryer have not been used for the approval of any Authority to Construct or as offsets or mitigation. The PTO has been surrendered and there is no activity in the shut-down whey-drying line.

Rule 2301 – Emission Reduction Banking

Section 5.5 states that ERC certificate applications shall be submitted within 180 days after the emission reduction occurs. The whey-drying equipment had ceased operation in late August of 2010. The permit was surrendered on 12/21/10. The application was received on February 23, 2011 within the 180 day timeframe allowed. Therefore, the application was submitted in a timely fashion.

Section 6.1.2 states that if the emission reductions were created as a result of the shutdown of a permitted emissions unit, the relevant Permit to Operate shall have been surrendered and voided. The Permit to Operate was surrendered and canceled by the District on 12/21/10.

VII. Recommendation

Issue ERC Certificates in the amounts posted in the table below and on the Draft ERC Certificates in Appendix H.

Bankable Emissions Reductions Credits (lb/Quarter)					
	NO _x	SO _x	PM10	CO	VOC
1st Quarter	618	30	711	3,485	57
2nd Quarter	473	23	455	2,668	43
3rd Quarter	646	31	821	3,640	59
4th Quarter	602	29	719	3,390	55

List of Appendixes

- A. Surrendered Permit to Operate
- B. Dryer Descriptions from Project 1080251
- C. Source Test Data
- D. Fuel Use Records and Production Records
- E. Emissions Inventory Statements
- F. NSO Determination
- G. Baseline Period Determination
- H. Draft Emission Reduction Credit Certificates

Appendix A
Surrendered Permit to Operate

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-525-10-5

EXPIRATION DATE: 10/31/2008

SECTION: 11 TOWNSHIP: 20S RANGE: 24E

EQUIPMENT DESCRIPTION:

12 MMBTU/HR "BLAW KNOX" DRYER #5 WITH BAGHOUSE: FOR RULE 4309 COMPLIANCE

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall comply with District Rule 4202, section 4.0 (12/17/92). [District Rule 4202] Federally Enforceable Through Title V Permit
5. Visible emissions from the exhaust of the dust collector serving the drying operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The amount of milk powder produced shall not exceed 72 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions shall not exceed 0.44 pounds per ton of milk powder produced. [District Rule 2201] Federally Enforceable Through Title V Permit
8. NOx emissions shall not exceed 3.5 ppmvd @ 19% O2 referenced as NO2. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
9. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. CO emissions shall not exceed 42 ppmvd @19% O2. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
11. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. This dryer shall be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

15. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All ducting from the drying operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The baghouse shall be equipped with an operational pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The owner/operator shall check for visible emissions on a weekly basis. If any particulate matter emissions are visible, the baghouse shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit
21. Baghouses shall be inspected at least quarterly when the unit is not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
23. Source testing to measure NOx and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
24. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
26. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
27. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
30. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

31. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month using a portable emission monitor (or at least once per week if an in-stack analyzer is used) that meets District specifications (in which a source test is not performed). Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
32. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer (or in-stack analyzer), exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer (or in-stack analyzer) readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
33. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
35. Records of baghouse maintenance, inspections, repair, and all change outs of filter media, shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. Permittee shall maintain records of dried milk powder produced in ton per day and operating schedule in number of hours per day, number of days per week, and number of weeks per calendar year. [District Rule 1070] Federally Enforceable Through Title V Permit
37. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix B Dryer Descriptions from Project 1080251

LOL has total 6 dryers that are subject to Rule 4309, turning the condensed milk and dairy products into powder. Table 1-1 lists the LOL's dryer units with brief descriptions. All dryers currently have active Title V permit (#: S-525-0-0) and individual Permit To Operate (PTO) as displayed in Table 1-1. In order to comply with the newly adopted Rule 4309, which regulates emissions of NO_x and carbon monoxide (CO) from dryers, LOL is submitting the Authority to Construct (ATC) application for the remaining three out of six dryers (i.e., Group 2), to demonstrate compliance with Rule 4309. ATC for the three dryers (Dryer #1, Dryer #7, and Plant 4 Dryer) has already been submitted to SJVAPCD as a Group I. The proposed application is for LOL's Dryer #4, Dryer #5, and Dryer #6 as shown in highlights in Table 1-1. The individual PTOs for Dryer #4, Dryer #5, and Dryer #6 are provided in Appendix A.

13
1-10
1-15

TABLE 1-1. DRYER UNIT DESCRIPTIONS

Permit Number	Fuel	Description of Equipment
S-525-3-2	Natural Gas	Dryer #4 dries primarily Non-Fat Dry Milk and is equipped with a baghouse.
S-525-10-2	Natural Gas	Dryer #5 dries primarily Whey Protein Concentrate and is equipped with a baghouse.
S-525-15-2	Natural Gas	Dryer #6 dries primarily Whole Milk and is equipped with a baghouse.
S-525-16-5	Natural Gas	Dryer #7 dries primarily Buttermilk and is equipped with a baghouse.

Land O'Lakes, Inc.
Rule 4309 Compliance Project (Group 2)

1-1

Trinity Consultants
080501.0002

S-525-30-10	Natural Gas	Plant 4 Dryer dries primarily Non-Fat Dry Milk and is equipped with a Low-NO _x burner and a baghouse.
S-525-36-3	Natural Gas	Dryer #1 dries primarily Non-Fat Dry Milk and is equipped with a Low-NO _x burner and a baghouse.

Appendix C Source Test Data

The following data is from the source test conducted on November 24, 2008 and received by the District on January 22, 2009.

R E M
PHONE: (551) 641-3065 FAX: (551) 260-6197

Land "O" Lakes
Dryer #5
Tulare
12 MMBtu/hr
Permit Number: S-525-10-3
November 24, 2008

EMISSION CONSTITUENT	Averages	Limit
Oxides of Nitrogen		
NOx, ppm	3.0	
NOx, ppm @ 19 % O2 (No Correction)	3.0	3.5
NOx, lbs/MMBtu	0.060	
Carbon Monoxide		
CO, ppm	27.7	
NOx, ppm @ 19 % O2 (No Correction)	27.7	42.0
CO, lbs/MMBtu	0.338	
Oxygen %	19.8	
Load	3000 lb/hr	

①
2/24/09

Appendix D

Fuel Use Records and Production Records

		Natural Gas Usage (cf)					
	Monthly Averages	2006	2007	2008	2009	2010	Average
1	Jan	5,334,624	4,069,877	4,933,481	4,309,838	3,590,337	4,447,631
2	Feb	4,698,754	4,244,899	4,313,914	3,678,465	3,890,562	4,165,319
3	Mar	4,990,546	4,652,371	4,822,442	4,528,682	2,912,581	4,381,324
4	Apr	4,973,678	4,119,667	4,570,286	2,085,555	3,833,216	3,916,480
5	May	3,940,183	3,331,415	4,741,763	3,022,214	2,528,303	3,512,776
6	Jun	3,723,885	3,083,496	4,182,073	3,539,175	2,528,584	3,411,443
7	Jul	3,617,721	3,917,830	4,292,550	3,433,151	2,876,318	3,627,514
8	Aug	3,797,256	3,676,919	4,331,975	4,008,816	1,616,664	3,486,326
9	Sep	3,854,542	3,572,346	4,397,966	3,527,368	-	3,070,444
10	Oct	3,765,692	4,728,832	4,076,376	3,533,553	-	3,220,891
11	Nov	4,046,878	4,180,949	3,926,826	2,248,599	-	2,880,650
12	Dec	4,587,186	4,658,836	4,649,559	3,854,299	-	3,549,976

Production (lbs)					
2006	2007	2008	2009	2010	Average
1,647,500	1,331,000	1,740,000	1,605,000	1,043,382	1,473,376
1,448,500	1,251,000	1,472,000	1,214,550	1,105,993	1,298,409
1,635,000	1,176,400	1,522,000	1,342,500	871,809	1,309,542
1,690,000	1,410,000	1,409,000	291,000	1,165,517	1,193,103
1,258,200	1,030,000	1,096,300	776,250	720,077	976,165
1,360,769	1,013,000	1,363,500	889,500	754,524	1,076,259
1,284,000	979,000	1,521,000	1,156,500	987,055	1,185,511
1,239,000	1,125,000	1,491,500	1,267,272	515,601	1,127,675
1,225,800	927,000	1,647,000	1,204,750	-	1,000,910
1,197,200	1,579,000	1,120,500	1,190,250	-	1,017,390
1,290,000	1,418,500	1,406,250	640,500	-	951,050
1,181,000	1,527,500	1,495,500	1,412,250	-	1,123,250

Appendix E Emissions Inventory Statements

Date / Time Printed 05/10/2000
10:17:59 AM

Emission Statement - Calendar Year 1999 Emissions

Facility ID # S - 525
TAD # 54 - 525
SIC 2023
Facility Name LAND O LAKES INC
TOXID # 50065

UTM Zone : 11
UTM East: 289.7
UTM North: 4008.9

Please Sign and Return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :

Device ID #	Process Number	Equipment Type	Rating	Yearly Process Rate	Units		Wk / Yr	Heat Content	Control Device	NOX # / Unit	TOG # / Unit	FROG # / Unit	SOX # / Unit	CO # / Unit	PM # / Unit	
					Source Classification Code											
1	1	BOILER #5 DIESEL FUEL	71.7	0	1000 GALLONS BURNED		52			7.9	1.06	0.8281	9.12	15.2	1.52	
					10200501					.0	.0	.0	.0	.0	.0	EMSSIONS
1	2	BOILER #5 - NAT GAS	71.7	101	MILLION CUBIC FEET BURNED		52			36.0	21.0	0.3965	.6	60.0	3.0	
					10200602					1.82	1.06	.42	.03	3.03	.15	EMSSIONS
2	1	BOILER #6 DIESEL FUEL	71.7	0	1000 GALLONS BURNED		52			7.9	1.06	0.8281	9.12	15.2	1.52	
					10200501					.0	.0	.0	.0	.0	.0	EMSSIONS
2	2	BOILER #6 - NAT GAS	71.7	233.2	MILLION CUBIC FEET BURNED		52			36.0	21.0	0.3965	.6	60.0	3.0	
					10200602					4.2	2.45	.97	.07	7.0	.35	EMSSIONS
3	1	DRYER 4	17.74	58.6	MILLION CUBIC FEET BURNED		52			140.0	5.8	0.3965	.6	35.0	3.0	
					30290003					2.72	.11	.04	.01	.68	.06	EMSSIONS
3	2	DRYER 4		11263	TONS PRODUCT		52			.0	.0	0	.0	.0	.44	
					30203001					.0	.0	.0	.0	.0	2.48	EMSSIONS
4	1	DRYER 5	12	47.5	MILLION CUBIC FEET BURNED		52			140.0	5.8	0.3965	.6	35.0	3.0	
					10200602					3.33	.14	.05	.01	.83	.07	EMSSIONS
4	2	DRYER 5		9014	TONS PRODUCT		52			.0	.0	0	.0	.0	.44	
					30203001					.0	.0	.0	.0	.0	1.98	EMSSIONS
5	1	DRYER 6	10	52.2	MILLION CUBIC FEET BURNED		52			140.0	5.8	0.3965	.6	35.0	3.0	
					30290003					3.65	.15	.06	.02	.91	.08	EMSSIONS
5	2	DRYER 6		9561	TONS PRODUCT		52			.0	.0	0	.0	.0	.44	
					30203001					.0	.0	.0	.0	.0	2.1	EMSSIONS
6	1	DRYER 7	8	0	MILLION CUBIC FEET BURNED		52			100.0	8.0	0.3965	.6	20.0	3.0	
					10200603					.0	.0	.0	.0	.0	.0	EMSSIONS
6	2	DRYER 7		0	TONS PRODUCT		52			.0	.0	0	.0	.0	.44	
					30203001					.0	.0	.0	.0	.0	.0	EMSSIONS
7	1	3 DIESEL FIRED IC ENGINES		0	1000 GALLONS BURNED		1			469.0	32.1	0.7343	31.2	102.0	33.5	
					20200102					.0	.0	.0	.0	.0	.0	EMSSIONS
9	1	P4 DRYER	28	159.5	MILLION CUBIC FEET BURNED		52			55.0	5.8	0.3965	.6	70.0	3.0	
					30290003					4.39	.46	.18	.05	5.58	.24	EMSSIONS
9	2	P4 DRYER		53879	TONS PRODUCT		52			.0	.0	0	.0	.0	.44	
					30203001					.0	.0	.0	.0	.0	11.85	EMSSIONS
10	1	DRYER 1	20	127.4	MILLION CUBIC FEET BURNED		52			65.0	5.8	0.3965	.6	70.0	3.0	
					30290003					4.14	.37	.15	.04	4.46	.19	EMSSIONS

This data was taken from last year's emissions inventory data. Please make any correction to this document in red ink.

Date / Time Printed 12/26/2000
8:47:01 AM

UTM Zone : 11
UTM East: 289.7
UTM North: 4008.9

Emission Statement - Calendar Year 2000 Emissions

Please Sign and Return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726

Facility ID # S - 525
TAD # 54 - 525
SIC 2023
Facility Name LAND O' LAKES, INC.
TOXID # 50065

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :

Y

Device ID #	Process Number	Equipment Type	Rating	Yearly Process Rate	Units		Wk / Yr	Control Device	NOX # / Unit	TOG # / Unit	Fraction Reactive Organic Gas	SOX # / Unit	CO # / Unit	PM # / Unit	Fraction PM10	EMSSIONS
					Source Classification Code											
1	1	BOILER #5 DIESEL FUEL		0 ✓	1000 GALLONS BURNED		52		7.9	1.06	.82	9.12	15.2	1.52	.82	
					10200501		1		.0	.0	.0	.0	.0	.0	.0	EMSSIONS
1	2	BOILER #5 - NAT GAS	1.01 ←	101 522	MILLION CUBIC FEET BURNED		52		36.0	20.0	.39	.6	63.7	3.0	.39	
					10200602		1		1.82	1.01	.39	.03	3.22	.15	.06	EMSSIONS
2	1	BOILER #6 DIESEL FUEL		0 ✓	1000 GALLONS BURNED		52		7.9	1.06	.82	9.12	15.2	1.52	.82	
					10200501				.0	.0	.0	.0	.0	.0	.0	EMSSIONS
2	2	BOILER #6 - NAT GAS	2.332 ←	233.2 2164	MILLION CUBIC FEET BURNED		52		36.0	20.0	.39	.6	63.7	3.0	.39	
					10200602				4.2	2.33	.91	.07	7.43	.35	.14	EMSSIONS
3	1	DRYER 4	.586 ←	58.6 546	MILLION CUBIC FEET BURNED		52		140.0	5.8	.39	.6	35.0	3.0	.39	
					30290003				2.72	.11	.04	.01	.67	.05	.02	EMSSIONS
3	2	DRYER 4		11263 9803	TONS PRODUCT		52		.0	.0	.0	.0	.0	.44	.69	
					30203001				.0	.0	.0	.0	.0	2.48	1.71	EMSSIONS
4	1	DRYER 5	.475 ←	47.5 546	MILLION CUBIC FEET BURNED		52		140.0	5.8	.39	.6	35.0	3.0	.39	
					10200602				3.33	.13	.05	.01	.83	.07	.03	EMSSIONS
4	2	DRYER 5		9014 9813	TONS PRODUCT		52		.0	.0	.0	.0	.0	.44	.69	
					30203001				.0	.0	.0	.0	.0	1.98	1.37	EMSSIONS
5	1	DRYER 6	.522 ←	52.2 468	MILLION CUBIC FEET BURNED		52		140.0	5.8	.39	.6	35.0	3.0	.39	
					30290003				3.65	.15	.06	.01	.91	.07	.03	EMSSIONS
5	2	DRYER 6		9561 7950	TONS PRODUCT		52		.0	.0	.0	.0	.0	.44	.69	
					30203001				.0	.0	.0	.0	.0	2.1	1.45	EMSSIONS
6	1	DRYER 7		0 ✓	MILLION CUBIC FEET BURNED		52		29.0	4.2	.39	.6	24.0	50.0	.39	
					10200603				.0	.0	.0	.0	.0	.0	.0	EMSSIONS
6	2	DRYER 7		0 ✓	TONS PRODUCT		52		.0	.0	.0	.0	.0	.44	.69	
					30203001				.0	.0	.0	.0	.0	.0	.0	EMSSIONS
7 31, 32, 33	1	DIESEL FIRED IC ENGINE		0 ✓	1000 GALLONS BURNED		1		469.0	32.1	.73	31.2	102.0	33.5	.73	
					20200102				.0	.0	.0	.0	.0	.0	.0	EMSSIONS
9	1	P4 DRYER		159.5 159.7	MILLION CUBIC FEET BURNED		52		58.0	6.5	.39	.6	75.0	3.0	.39	
					30290003				4.63	.51	.2	.04	5.98	.23	.09	EMSSIONS
9	2	P4 DRYER		53879 54458	TONS PRODUCT		52		.0	.0	.0	.0	.0	.0	.69	
					30203001				.0	.0	.0	.0	.0	.1	.07	EMSSIONS
10	1	DRYER 1		127.4 115.4	MILLION CUBIC FEET BURNED		52		68.3	3.0	.39	.6	73.5	3.0	.39	
					30290003				4.35	.19	.07	.03	4.68	.19	.07	EMSSIONS

This data was taken from last year's emissions inventory data. Please make any correction to this document in red ink.

Note: For 1999, the cubic feet listed was in error (decimal out of place)
Per Leland - did not correct 1999 #s at this time (Vol) CL
Per Leland - corrected Device 7 to 31, 32, 33. CL

Date / Time Printed 01/22/2002
7:56:58 AM

Emission Statement - Calendar Year 2001 Emissions

Facility ID # S - 525
TAD # 54 - 525
SIC 2023
Facility Name LAND O' LAKES, INC.
TOXID # 50065

UTM Zone : 11
UTM East: 289.7
UTM North: 4008.9

Please Sign and Return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :

Y

Device ID #	Process Number	Equipment Type	Rating	Yearly Process Rate	Units		Wk / Yr	Control Device	NOX # / Unit	TOG # / Unit	Fraction	SOX # / Unit	CO # / Unit	PM # / Unit	Fraction PM10	
					Source Classification Code						Reactive Organic Gas					
1	1	BOILER #5 DIESEL FUEL		0	1000 GALLONS BURNED		52		7.9	1.06	.82	9.12	15.2	1.52	.82	
					10200501				.0	.0	.0	.0	.0	.0	.0	EMSSIONS
1	2	BOILER #5 - NAT GAS		0.522	MILLION CUBIC FEET BURNED		52		36.0	20.0	.39	.6	63.7	3.0	.39	
					10200602				.01	.01	.0	.0	.02	.0	.0	EMSSIONS
2	1	BOILER #6 DIESEL FUEL		0	1000 GALLONS BURNED		52		7.9	1.06	.82	9.12	15.2	1.52	.82	
					10200501				.0	.0	.0	.0	.0	.0	.0	EMSSIONS
2	2	BOILER #6 - NAT GAS		2.164	MILLION CUBIC FEET BURNED		52		36.0	20.0	.39	.6	63.7	3.0	.39	
					10200602				.04	.02	.01	.0	.07	.0	.0	EMSSIONS
3	1	DRYER 4		0.546	MILLION CUBIC FEET BURNED		52		140.0	5.8	.39	.6	35.0	3.0	.39	
					30290003				.04	.0	.0	.0	.01	.0	.0	EMSSIONS
3	2	DRYER 4		9803	TONS PRODUCT		52		.0	.0	.0	.0	.0	.44	.69	
					30203001				.0	.0	.0	.0	.0	2.16	1.49	EMSSIONS
4	1	DRYER 5		0.546 54.6	MILLION CUBIC FEET BURNED		52		140.0	5.8	.39	.6	35.0	3.0	.39	
					10200602				.04	.0	.0	.0	.01	.0	.0	EMSSIONS
4	2	DRYER 5		9813	TONS PRODUCT		52		.0	.0	.0	.0	.0	.44	.69	
					30203001				.0	.0	.0	.0	.0	2.16	1.49	EMSSIONS
5	1	DRYER 6		0.468	MILLION CUBIC FEET BURNED		52		140.0	5.8	.39	.6	35.0	3.0	.39	
					30290003				.03	.0	.0	.0	.01	.0	.0	EMSSIONS
5	2	DRYER 6		7950	TONS PRODUCT		52		.0	.0	.0	.0	.0	.44	.69	
					30203001				.0	.0	.0	.0	.0	1.75	1.21	EMSSIONS
6	1	DRYER 7		0	MILLION CUBIC FEET BURNED		52		29.0	4.2	.39	.6	24.0	50.0	.39	
					10200603				.0	.0	.0	.0	.0	.0	.0	EMSSIONS
6	2	DRYER 7		0	TONS PRODUCT		52		.0	.0	.0	.0	.0	.44	.69	
					30203001				.0	.0	.0	.0	.0	.0	.0	EMSSIONS
9	1	P4 DRYER		159.7	MILLION CUBIC FEET BURNED		52		58.0	6.5	.39	.6	75.0	3.0	.39	
					30290003				4.63	.52	.2	.05	5.99	.24	.09	EMSSIONS
9	2	P4 DRYER		54658	TONS PRODUCT		52		.0	.0	.0	.0	.0	.0	.69	
					30203001				.0	.0	.0	.0	.0	.11	.08	EMSSIONS
10	1	DRYER 1		115.4	MILLION CUBIC FEET BURNED		52		68.3	3.0	.39	.6	73.5	3.0	.39	
					30290003				3.94	.17	.07	.03	4.24	.17	.07	EMSSIONS
10	2	DRYER 1		34998	TONS PRODUCT		52		.0	.0	.0	.0	.0	.34	.69	
					30203001				.0	.0	.0	.0	.0	5.95	4.11	EMSSIONS

This data was taken from last year's emissions inventory data. Please make any correction to this document in red ink.

Date / Time Printed 9/25/2003
11:16:18 AM

Emission Statement - Calendar Year 2002 Emissions

UTM Zone : 11
UTM East: 289.7
UTM North: 4008.9

Please Sign and Return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726

Facility ID # S - 525
TAD # 54 - 525
SIC 2023
Facility Name LAND O' LAKES, INC.
TOXID # 50065

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :

Y

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units	NOX Lb / Unit	TOG Lb / Unit	Fraction of ROG	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM Lb / Unit	Fraction of PM10	PM10 Lb / Unit	
				Source Classification Code										
1	1	71.7 MMBTU/HR DIESEL BOILER #5	0	1000 GALLONS BURNED	52.0	.0	.0	F 7.0	60.0	95.55	.0	.0	10.0	
				10200501	.0	.0	.0	.0	.0	.0	.0	.0	.0	(Tons/Yr)
1	2	71.7 MMBTU/HR NATURAL GAS BOILER #5	64	MILLION CUBIC FEET BURNED	36.0	.0	.0	F 20.0	.6	63.7	.0	.0	3.0	
				10200602	1.15	.0	.0	.64	.02	2.04	.0	.0	.1	(Tons/Yr)
2	1	71.7 MMBTU/HR DIESEL BOILER #6	0	1000 GALLONS BURNED	52.0	.0	.0	F 7.0	60.0	95.55	.0	.0	10.0	
				10200501	.0	.0	.0	.0	.0	.0	.0	.0	.0	(Tons/Yr)
2	2	71.7 MMBTU/HR NATURAL GAS BOILER #6	578	MILLION CUBIC FEET BURNED	36.0	.0	.0	F 20.0	.6	63.7	.0	.0	3.0	
				10200602	10.4	.0	.0	5.78	.17	18.41	.0	.0	.87	(Tons/Yr)
3	1	17.74 MMBTU/HR NATURAL GAS DRYER #4	14	MILLION CUBIC FEET BURNED	140.0	.0	.0	F 5.8	.6	35.0	3.0		.0	
				30290003	.98	.0	.0	.04	.0	.25	.02		.0	(Tons/Yr)
3	2	17.74 MMBTU/HR DRYER #4 - PRODUCT	21900	TONS PRODUCT	.0	.0	.0	F .0	.0	.0	.44		.0	
				30203001	.0	.0	.0	.0	.0	.0	4.82		.0	(Tons/Yr)
10	1	12 MMBTU/HR NATURAL GAS DRYER #5	15.33	MILLION CUBIC FEET BURNED	140.0	.0	.0	F 5.8	.6	35.0	3.0		.0	
				30290003	1.07	.0	.0	.04	.0	.27	.02		.0	(Tons/Yr)
10	2	12 MMBTU/HR DRYER #5 - PRODUCT	17520	TONS PRODUCT	.0	.0	.0	F .0	.0	.0	.44		.0	
				30203001	.0	.0	.0	.0	.0	.0	3.85		.0	(Tons/Yr)
11	1	DRY POWDER STORAGE SILO #1	0	TONS PRODUCT	.0	.0	.0	F .0	.0	.0	.0	.0	.02	
				30203099	.0	.0	.0	.0	.0	.0	.0	.0	.0	(Tons/Yr)
12	1	DRY POWDER STORAGE SILO #2	0	TONS PRODUCT	.0	.0	.0	F .0	.0	.0	.0	.0	.02	
				30203099	.0	.0	.0	.0	.0	.0	.0	.0	.0	(Tons/Yr)
	1	DRY POWDER STORAGE SILO #3	0	TONS PRODUCT	.0	.0	.0	F .0	.0	.0	.0	.0	.02	
				30203099	.0	.0	.0	.0	.0	.0	.0	.0	.0	(Tons/Yr)
14	1	DRY POWDER STORAGE SILO #4	0	TONS PRODUCT	.0	.0	.0	F .0	.0	.0	.0	.0	.02	
				30203099	.0	.0	.0	.0	.0	.0	.0	.0	.0	(Tons/Yr)
15	1	10 MMBTU/HR NATURAL GAS DRYER #6	27.39	MILLION CUBIC FEET BURNED	140.0	.0	.0	F 5.8	.6	35.0	3.0		.0	
				30290003	1.92	.0	.0	.08	.01	.48	.04		.0	(Tons/Yr)
15	2	10 MMBTU/HR DRYER #6 - PRODUCT	17520	TONS PRODUCT	.0	.0	.0	F .0	.0	.0	.44		.0	
				30203001	.0	.0	.0	.0	.0	.0	3.85		.0	(Tons/Yr)
16	1	8 MMBTU/HR MILK & WHEY NG DRYER #7	0	MILLION CUBIC FEET BURNED	140.0	.0	.0	F 2.8	.6	35.0	3.0		.0	
				30290003	.0	.0	.0	.0	.0	.0	.0		.0	(Tons/Yr)
16	2	8MMBTU/HR MILK & WHEY DRYER #7 - PRODUCT	0	TONS PRODUCT	.0	.0	.0	F .0	.0	.0	.44		.0	
				30203001	.0	.0	.0	.0	.0	.0	.0		.0	(Tons/Yr)

This data was taken from last year's emissions inventory data. Please make any correction to this document in red ink.

Last Updated By LAWLERC

Emission Statement - Calendar Year 2003 Emissions

Date Printed: 5/3/2004

Facility ID# S-525
 TAD # 54-525
 SIC 2023
 Facility Name Land O'Lakes, Inc.
 TOXID # 50065

UTM Zone: 11
 UTM East: 289.7
 UTM North: 4008.9

Please sign and Return to:
 San Joaquin Valley Unified APCD
 1990 East Gettysburg Avenue
 Fresno, CA 93726

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL:

Y

Device ID#	Process Number	Equipment Type	Yearly Process Rate	Units		NOx #/unit	TOG #/unit	Fraction Reactive Organic Gas	VOC #/unit	SOx #/unit	CO #/unit	PM #/unit	Fraction PM ₁₀	PM10 #/unit
				Source Classification Code										
1	1	Boiler #5 Diesel Fuel	0	1,000 Gallons Burned	52.00	0.00	0.00	7.00	60.00	95.55	0.00	0.00	10.00	
				10200501	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	2	Boiler #5 Natural Gas	14.7	Million Cubic Feet Burned	38.00	0.00	0.00	20.00	0.60	63.70	0.00	0.00	3.00	
				10200602	0.28	0.00	0.00	0.15	0.00	0.47	0.00	0.00	0.02	ton/yr
2	1	Boiler #6 Diesel Fuel	0	1,000 Gallons Burned	52.00	0.00	0.00	7.00	60.00	95.55	0.00	0.00	10.00	
				10200501	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	ton/yr
2	2	Boiler #6 Natural Gas	58.7	Million Cubic Feet Burned	38.00	0.00	0.00	20.00	0.60	63.70	0.00	0.00	3.00	
				10200602	1.08	0.00	0.00	0.59	0.02	1.87	0.00	0.00	0.09	ton/yr
3	1	Dryer 4	1.2	Million Cubic Feet Burned	140.00	0.00	0.00	5.80	0.60	35.00	3.00		0.00	
				30290003	0.08	0.00	0.00	0.00	0.00	0.02	0.00		0.00	ton/yr
3	2	Dryer 4	10536	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.44		0.00	
				30203001	0.00	0.00	0.00	0.00	0.00	0.00	2.32		0.00	ton/yr
10	1	Dryer 5	16.8	Million Cubic Feet Burned	140.00	0.00	0.00	5.80	0.60	35.00	3.00		0.00	
				10200602	1.16	0.00	0.00	0.05	0.00	0.29	0.02		0.00	ton/yr
10	2	Dryer 5	8849	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.44		0.00	
				30203001	0.00	0.00	0.00	0.00	0.00	0.00	1.95		0.00	ton/yr
11	1	Dry Powder Storage Silo #1	4848	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	
				30203099	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	ton/yr
12	1	Dry Powder Storage Silo #2	4846	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	
				30203099	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	ton/yr
13	1	Dry Powder Storage Silo #3	4846	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	
				30203099	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	ton/yr

All 2003 data shown in red.

Emission Statement - Calendar Year 2004 Emissions

Date Printed: 08/18/2005

Facility ID# S-525
 TAD # 54-525
 SIC 2023
 Facility Name Land O'Lakes, Inc.
 TOXID # 50065

UTM Zone: 11
 UTM East: 289.7
 UTM North: 4008.9

Please sign and Return to:
 San Joaquin Valley Unified APCD
 1990 East Gettysburg Avenue
 Fresno, CA 93726

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL:

Y

Device ID#	Process Number	Equipment Type	Yearly Process Rate	Units	NOx #/unit	TOG #/unit	Fraction Reactive Organic Gas	VOC #/unit	SOx #/unit	CO #/unit	PM #/unit	Fraction PM ₁₀	PM10 #/unit	
				Source Classification Code										
1	1	Boiler #5 Diesel Fuel	0	1,000 Gallons Burned	52.00	0.00	0.00	7.00	60.00	95.55	0.00	0.00	10.00	
				10200501	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	2	Boiler #5 Natural Gas	17.03	Million Cubic Feet Burned	36.00	0.00	0.00	20.00	0.60	63.70	0.00	0.00	3.00	
				10200602	0.31	0.00	0.00	0.17	0.01	0.54	0.00	0.00	0.03	ton/yr
2	1	Boiler #6 Diesel Fuel	0	1,000 Gallons Burned	52.00	0.00	0.00	7.00	60.00	95.55	0.00	0.00	10.00	
				10200501	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	ton/yr
2	2	Boiler #6 Natural Gas	40.89	Million Cubic Feet Burned	36.00	0.00	0.00	20.00	0.60	63.70	0.00	0.00	3.00	
				10200602	0.74	0.00	0.00	0.41	0.01	1.30	0.00	0.00	0.06	ton/yr
3	1	Dryer 4	89.2	Million Cubic Feet Burned	140.00	0.00	0.00	5.80	0.60	35.00	3.00		0.00	
				30290003	6.24	0.00	0.00	0.26	0.03	1.56	0.13		0.00	ton/yr
3	2	Dryer 4	11431	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.44		0.00	
				30203001	0.00	0.00	0.00	0.00	0.00	0.00	2.51		0.00	ton/yr
10	1	Dryer 5	44.8	Million Cubic Feet Burned	140.00	0.00	0.00	5.80	0.60	35.00	3.00		0.00	
				10200602	3.14	0.00	0.00	0.13	0.01	0.78	0.07		0.00	ton/yr
10	2	Dryer 5	7389.27	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.44		0.00	
				30203001	0.00	0.00	0.00	0.00	0.00	0.00	2.49		0.00	ton/yr
11	1	Dry Powder Storage Silo #1	5683	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	
				30203099	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	ton/yr

All 2004 data shown in red.

51064628

Emission Statement - Calendar Year 2005 Emissions

Date Printed:

11/10/2006

UTM Zone: 11
 UTM East: 289.7
 UTM North: 4008.9

Please sign and Return to:
 San Joaquin Valley Unified APCD
 1990 East Gettysburg Avenue
 Fresno, CA 93726

Facility ID# S-525
 TAD # 54-525
 SIC 2023
 Facility Name Land O'Lakes, Inc.
 TOXID # 50065

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL:

Y

Device ID#	Process Number	Equipment Type	Yearly Process Rate	Units		NOx #/unit	TOG #/unit	Fraction Reactive Organic Gas	VOC #/unit	SOx #/unit	CO #/unit	PM #/unit	Fraction PM ₁₀	PM10 #/unit	
				Source Classification Code											
1	1	Boiler #5 Diesel Fuel	0.00	1,000 Gallons Burned	52.00	0.00	0.00	7.00	60.00	95.55	0.00	0.00	10.00		
				10200501	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	2	Boiler #5 Natural Gas	96.51	Million Cubic Feet Burned	37.44	0.00	0.00	20.80	0.62	61.36	0.00	0.00	3.12		
				1020602	1.62	0.00	0.00	0.90	0.03	2.85	0.00	0.00	0.13	ton/yr	
2	1	Boiler #6 Diesel Fuel	0.00	1,000 Gallons Burned	52.00	0.00	0.00	7.00	60.00	95.55	0.00	0.00	10.00		
				10200501	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	ton/yr
2	2	Boiler #6 Natural Gas	61.63	Million Cubic Feet Burned	37.44	0.00	0.00	20.80	0.62	61.36	0.00	0.00	3.12		
				1020602	1.16	0.00	0.00	0.84	0.02	1.99	0.00	0.00	0.10	ton/yr	
3	1	Dryer 4	60.33	Million Cubic Feet Burned	190.00	0.00	0.00	5.50	0.60	84.00	0.00	0.00	7.60		
				30290003	3.02	0.00	0.00	0.17	0.02	2.53	0.00	0.00	0.23	ton/yr	
3	2	Dryer 4	9,709.35	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.44		
				30203001	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.14	ton/yr	
10	1	Dryer 5	51.43	Million Cubic Feet Burned	100.00	0.00	0.00	5.50	0.60	84.00	0.00	0.00	7.60		
				1020602	2.57	0.00	0.00	0.14	0.02	2.16	0.00	0.00	0.20	ton/yr	
10	2	Dryer 5	8,270.44	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.44		
				30203001	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.82	ton/yr	
11	1	Dry Powder Storage Silo #1	4,464.85	Tons Product	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02		
				30203099	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	ton/yr	

All 2005 data shown in red.

Appendix F NSO Determination

NSO is determined by adding the fuel use from the Emissions Inventory Sheets (from 1999 through 2005) to the fuel use records supplied by the applicant (January 2006 through July 2010). The total is then divided by 11 7/12 years for the annual average, and then the annual average is divided into 12 months for the grand monthly average, which is NSO.

The throughput in tons of whey are also tallied for this same period.

The figures and results are posted in the following table.

NSO Determination		
Emissions Inventory Data		
Year	Fuel Use (MMscf)	Tons of Whey
1999	47.5	9,014
2000	54.6	9,813
2001	54.6	9,813
2002	15.3	17,520
2003	16.6	8,849
2004	44.8	7,389
2005	51.43	8,270
Total	284.83	70,668
Fuel Use Data		
	MMscf	Tons
4-Year 7-Month Total	216.9	29,631
Grand NSO Total		
	MMscf	Tons
Grand Total	501.75	100,299
Annual Average	43.317	8,722
Monthly Average	3.609692	726.80

Appendix G Baseline Period Determination

Month	Total SCF for the Month	24 Month Block Averages	36 Month Block Averages	48 Month Block Averages
Jan-06	5,334,624			
Feb-06	4,698,754			
Mar-06	4,990,546			
Apr-06	4,973,678			
May-06	3,940,183			
Jun-06	3,723,885			
Jul-06	3,617,721			
Aug-06	3,797,256			
Sep-06	3,854,542			
Oct-06	3,765,692			
Nov-06	4,046,878			
Dec-06	4,587,186			
Jan-07	4,069,877			
Feb-07	4,244,899			
Mar-07	4,652,371			
Apr-07	4,119,667			
May-07	3,331,415			
Jun-07	3,083,496			
Jul-07	3,917,830			
Aug-07	3,676,919			
Sep-07	3,752,346			
Oct-07	4,728,832			
Nov-07	4,180,949			
Dec-07	4,658,836	4,156,183		
Jan-08	4,933,481	4,139,468		
Feb-08	4,313,914	4,123,433		
Mar-08	4,822,442	4,116,429		
Apr-08	4,570,286	4,099,621		
May-08	4,741,763	4,133,020		
Jun-08	4,182,073	4,152,111		
Jul-08	4,292,550	4,180,229		
Aug-08	4,331,975	4,202,509		
Sep-08	4,397,966	4,225,152		
Oct-08	4,076,376	4,238,097		
Nov-08	3,926,826	4,233,095		
Dec-08	4,649,559	4,235,694	4,249,655	
Jan-09	4,309,838	4,245,692	4,221,189	
Feb-09	3,678,465	4,222,091	4,192,848	
Mar-09	4,528,682	4,216,937	4,180,018	
Apr-09	2,085,555	4,132,182	4,099,793	
May-09	3,022,214	4,119,299	4,074,293	
Jun-09	3,539,175	4,138,286	4,069,163	
Jul-09	3,433,151	4,118,091	4,064,036	
Aug-09	4,008,816	4,131,920	4,069,912	
Sep-09	3,527,368	4,122,546	4,060,824	
Oct-09	3,533,553	4,072,742	4,054,376	
Nov-09	2,248,599	3,992,228	4,004,424	
Dec-09	3,854,299	3,958,705	3,984,066	4,057,444
Jan-10	3,590,337	3,902,741	3,970,745	4,021,105
Feb-10	3,890,562	3,885,101	3,960,902	4,004,267
Mar-10	2,912,581	3,805,524	3,912,575	3,960,976
Apr-10	3,833,216	3,774,812	3,904,618	3,937,217
May-10	2,528,303	3,682,585	3,882,309	3,907,803
Jun-10	2,528,584	3,613,690	3,866,895	3,882,900
Jul-10	2,876,318	3,554,680	3,837,964	3,867,455

The preceding 24 month period has a fuel-use average that is closest to the historic NSO average of 3,609,692 scf/month.

Therefore, the 24 month period from July 2008 thru June 2010 will be selected as the Baseline Period for this project.

Appendix H
Draft ERC Certificates

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-3625-1

ISSUED TO: LAND O' LAKES, INC.
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 400 SOUTH "M" ST
TULARE, CA 93274

For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
57 lbs	43 lbs	59 lbs	55 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

Shutdown of Dryer #5 (S-525-10)

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-3625-2

ISSUED TO: LAND O' LAKES, INC.
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 400 SOUTH "M" ST
TULARE, CA 93274

For NOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
618 lbs	473 lbs	646 lbs	602 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

Shutdown of Dryer #5 (S-525-10)

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-3625-3

ISSUED TO: LAND O' LAKES, INC.
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 400 SOUTH "M" ST
TULARE, CA 93274

For CO Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
3,485 lbs	2,668 lbs	3,640 lbs	3,390 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

Shutdown of Dryer #5 (S-525-10)

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-3625-4

ISSUED TO: LAND O' LAKES, INC.
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 400 SOUTH "M" ST
TULARE, CA 93274

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
711 lbs	455 lbs	821 lbs	719 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

Shutdown of Dryer #5 (S-525-10)

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-3625-5

ISSUED TO: LAND O' LAKES, INC.
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 400 SOUTH "M" ST
TULARE, CA 93274

For SOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
30 lbs	23 lbs	31 lbs	29 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

Shutdown of Dryer #5 (S-525-10)

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services