



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

APR 23 2012

Joe Etcheverry of Shafter Hay & Cube, LLC
c/o Jim Wakeman, ERM
5001 California Ave, Suite 205
Bakersfield, CA 93309

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: S-1114036

Dear Mr. Etcheverry:

Enclosed for your review and comment is the District's analysis of Shafter Hay & Cube, LLC's application for Emission Reduction Credits (ERCs) resulting from the shutdown of this facility, at 18650 Wildwood Ave in Buttonwillow. The quantity of ERCs proposed for banking is 1,944 lb-PM10/yr.

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. Kris Rickards of Permit Services at (661) 392-5611.

Sincerely,

David Warner
Director of Permit Services

DW: KTR/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
Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

APR 23 2012

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-1114036

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Shafter Hay & Cube, LLC's application for Emission Reduction Credits (ERCs) resulting from the shutdown of this facility, at 18650 Wildwood Ave in Buttonwillow. The quantity of ERCs proposed for banking is 1,944 lb-PM10/yr.

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.

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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

APR 23 2012

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-1114036

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Shafter Hay & Cube, LLC's application for Emission Reduction Credits (ERCs) resulting from the shutdown of this facility, at 18650 Wildwood Ave in Buttonwillow. The quantity of ERCs proposed for banking is 1,944 lb-PM10/yr.

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. Kris Rickards of Permit Services at (661) 392-5611.

Sincerely,

David Warner
Director of Permit Services

DW: KTR/cm

Enclosure

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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 Shafter Hay & Cube, LLC for the shutdown of this facility, at 18650 Wildwood Ave in Buttonwillow. The quantity of ERCs proposed for banking is 1,944 lb-PM10/yr.

The analysis of the regulatory basis for this proposed action, Project #S-1114036, 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, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**

**San Joaquin Valley Air Pollution Control District
ERC Application Review
Removal of Hay Grinding and Cubing Operation**

Facility Name: Shafter Hay & Cube, LLC
Mailing Address: 19000 Wildwood Ave
Buttontwillow, CA 93206

Date: April 4, 2012
Engineer: Kris Rickards
Lead Engineer: Allan Phillips

Contact Person: Joe Etcheverry
Telephone: 661-767-5264

Jim Wakeman (Consultant, ERM)
661-326-6770 x15

Project #: S-1114036

Submitted: September 16, 2012

Deemed Complete: October 13, 2011

I. Summary

Shafter Hay & Cube, LLC (hereafter referred to as SH&C) submitted an application to bank PM₁₀ emission reduction credits (ERCs) for the shutdown of their hay receiving, chopping, grinding, cubing, and cooling operation listed on permit S-210-1. SH&C has decided to cease operations and shut down all equipment at this site. In May of 2011 the decision was made to not start up for the season and all permitted equipment at the site remained idle (permit S-210-1 was not cancelled until September 16, 2011).

An application for ERC's was filed within 180 days following the cancellation of this permit and shutdown of the equipment, pursuant to Rule 2301, "Emission Reduction Credit Banking", Section 4.2.3.

The following reductions have been found to qualify for an emission reduction banking certificate (see following calculations in evaluation).

Bankable Emission Reduction Credits (lb/Quarter)	
	PM10
1st Quarter	0
2nd Quarter	691
3rd Quarter	1,099
4th Quarter	154

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2301	Emission Reduction Credit Banking (1/19/12)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4202	Particulate Matter - Emission Rate (12/17/92)

III. Location of Reduction

This equipment is located on SH&C's closed facility at 18650 Wildwood Ave. in Buttonwillow.

IV. Method of Generating Reductions

Actual Emissions Reductions (AER) were generated by the voluntary closure of this facility.

The following permit was surrendered with this ERC application and cancelled September 16, 2011 (see Appendix C):

S-210-1-3: HAY RECEIVING, CHOPPING, GRINDING, CUBING AND COOLING OPERATION CONSISTING OF TWO METER BOXES WITH CHOPPING BLADES, HAY BALE FEED CONVEYOR, ENCLOSED WARREN AND BAERG MODEL G272VRC-300 HAY BALE GRINDER, GRINDER DISCHARGE CONVEYOR, ENCLOSED MIXER, TWO HAY CUBERS AND ENCLOSED CUBE COOLER DISCHARGING VIA CONVEYORS TO STORAGE BARN. GRINDER, CHOPPERS, COOLER AND CUBERS ALL VENTED TO 50 INCH DIAMETER 1D-3D CYCLONE WHICH DISCHARGES COLLECTED FINES TO MIXER FEED CONVEYOR

As required by Rules 2201 and 2301, creditable emission reductions are to be based upon the equipment's operating history over the appropriate baseline period, and the use of acceptable emission factors.

V. Calculations

A. Assumptions

- The emission factor for hay grinding is assumed to be represented by the PM emission factor for grain milling with a hammer mill controlled by a cyclone given in AP-42, Table 9.9.1-2 and assuming that PM₁₀ is 50% of the PM emission factor (as calculated in project S-1092090):

$$E_{\text{grinding}} = 50\% \times 0.067 \text{ lb-PM/ton throughput} = 0.034 \text{ lb-PM}_{10}/\text{ton throughput}$$

- The emission factor for hay cubing is assumed to be represented by the PM emission factor for grain pelletizing controlled by a cyclone given in AP-42, Table 9.9.1-2 and assuming that PM₁₀ is 50% of the PM emission factor (as calculated in project S-1092090):

$$E_{\text{cubing}} = 50\% \times 0.36 \text{ lb-PM/ton throughput} = 0.18 \text{ lb-PM}_{10}/\text{ton throughput}$$

- Historical hay throughputs are from facility records (Appendix A).
- Baseline period was based on historical hay throughput using previous 2 operating seasons (2009-2010, Appendix A), where an operating season is approximately between May-October

B. Baseline Period Determination

Per Section 3.9 of Rule 2201, Baseline Period is defined as:

1. The two consecutive years of operation immediately prior to the submission date of the complete application; or
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 (NSO)*; or
3. A shorter period of at least one year if the emissions unit has not been in operation for two years and this represents the full operational history of the emissions unit, including any replacement units; or
4. Zero years if an emissions unit has been in operation for less than one year (only for use when calculating Actual Emissions Reductions (AER)).

Rule 2301 titled "Emissions Reduction Credit Banking" defines Baseline Period as "the same period as defined in Rule 2201".

The application requesting ERCs for removal of this equipment was received in September of 2011. The applicant has requested to use the two consecutive seasons of operation immediately prior to the submission of the application (May-October of 2009 and May-September of 2010). Therefore the baseline period is the two-year period from January 2009 through December 2010.

Average quarterly throughputs for the baseline period are shown below (see Appendix B for detailed throughput):

Quarterly Historical Actual Throughputs (tons/qtr)				
	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
S-210-1	0	3,590	5,705	800

C. Historical Actual Emissions (HAE)

Historical emissions are calculated by multiplying the combined emissions factor of 0.18 + 0.034 = 0.214 lb-PM₁₀/ton throughput by the historical actual quarterly throughput and summarized below:

Quarterly Historical Actual Emissions (lb-PM ₁₀ /qtr)				
	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
S-210-1	0	768	1,221	171

E. 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 the 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 this operation. 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 no reductions from this operation 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 this operation type 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.
 - c. There are no SLCs related to this operation. The emissions were taken from the actual throughput records. Any adjustments to be made for any Rules will be addressed under the applicable Rules listed below. Therefore, no adjustments will be made to the HAE under this section.

This operation has undergone permitting under Rule 2201 and the permits comply with all NSR requirements. No adjustments to the HAE are required under Rule 2201.

2. Actual Emissions Reductions (AER)

Since no adjustments have been made to the HAE, the AER is calculated pursuant to Section 3.2 of Rule 2201 where the AER shall be real, surplus, permanent, quantifiable and enforceable. The AER is calculated per subsection 4.12 as follows:

$$\text{AER} = \text{HAE} - \text{PE2}$$

Where: HAE = Historic Actual Emissions
PE2 = Post-Project Potential to Emit

The post-project potential to emit (PE2) is equal to zero since the equipment has been shut down. Therefore, the AER is calculated below using the equation: $AER = HAE - PE2$

Actual Emission Reduction (lb-PM₁₀/qtr)				
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (Jul –Sep)	Q4 (Oct-Dec)
HAE	0	768	1,221	171
PE2	0	0	0	0
AER	0	768	1,221	171

3. Air Quality Improvement Deduction (AQID)

Pursuant to Rule 2201 Section 3.6, the AQID is a 10% discount factor applied to AER before the AER is eligible for banking.

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

Air Quality Improvement Deduction (lb-PM₁₀/qtr)				
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (Jul –Sep)	Q4 (Oct-Dec)
AER	0	768	1,221	171
AQID	0	77	122	17

4. Increase in Permitted Emissions (IPE)

All equipment has been shut down at this facility. 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

To obtain the bankable emissions, the AQID is subtracted from the AER as shown below:

Air Quality Improvement Deduction (lb-PM₁₀/qtr)				
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (Jul –Sep)	Q4 (Oct-Dec)
AER	0	768	1,221	171
AQID	0	77	122	17
Bankable Reductions	0	691	1,099	154

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 hay grinding and cubing equipment. The emissions reductions were calculated from actual historic data and recognized emission factors. Therefore, the emission reductions are real.

B. Enforceable

This facility and equipment have been shut down and permits cancelled. Therefore, the reductions are enforceable.

C. Quantifiable

The reductions are quantifiable since they were calculated from historic production records, 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 equipment has been shut down and permits have been cancelled. Therefore, the reductions are considered 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 this equipment have not been used for the approval of any Authority to Construct or as offsets or mitigation. The ATCs have been implemented, inspected and converted to Permits to Operate (PTO).

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 equipment at this facility was shut down in May of 2011, after the decision was made to not start up operations for the 2011 season. The application for ERCs was received on September 16, 2011 within the 180 day timeframe allowed. Therefore, the application was submitted in a timely fashion.

A copy of the PTO for this operation is included in Appendix C.

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.

Based on a 15 hp motor, exhaust flow from the cyclone is estimated to be 7,500 scfm. Therefore, assuming the PM emissions are 50% PM₁₀ and a 10 hour operating day:

$$\frac{32.1 \text{ lb-PM}_{10}/\text{day} \times 2 \text{ lb-PM}/\text{lb-PM}_{10} \times 7,000 \text{ grains}/\text{lb}}{7,500 \text{ scfm} \times 60 \text{ min}/\text{hr} \times 10 \text{ hours}/\text{day}} = 0.0999 \text{ grains}/\text{scf}$$

Since 0.0999 grain /scf is less than 0.1 grain·PM₁₀/scf, no adjustment is necessary for Rule 4201.

Rule 4202 - Particulate Matter Emission Rate

Per section 4.1, particulate matter (PM) emissions from any source operation shall not exceed the allowable hourly emission rate ($E_{\text{allowable}}$) as calculated using the following applicable formulas:

$$E_{\text{allowable}} = 3.59 P^{0.62} \text{ (when, } P = \text{ process weight rate } \leq 30 \text{ tons}/\text{hr})$$

$$E_{\text{allowable}} = 17.31 P^{0.16} \text{ (when, } P = \text{ process weight rate } > 30 \text{ tons}/\text{hr})$$

Maximum process rate for the hay grinding is 15 tons per hour. Therefore, the maximum emission rate is:

$$E_{\text{allowable}} = 3.59 \times 15^{0.62} = 19.24 \text{ lb-PM}/\text{hour}$$

Maximum actual hourly emission rate (E_{actual}) for this unit is calculated based a 10 hour operating day and a PM emission rate equal to twice the PM₁₀ rate (assuming the PM emissions are 50% PM₁₀):

$$E_{\text{actual}} = (2 \text{ lb-PM}/\text{lb-PM}_{10}) \times (\text{PE2 daily}/10 \text{ operating hours per day}) = 2 \times (32.1/10)$$

$$E_{\text{actual}} = 6.42 \text{ lb-PM}/\text{hour}$$

Since 6.42 lb-PM/hour is less than 19.24 lb-PM/hour, compliance with this rule is expected.

VII. Recommendation

Issue an ERC Certificate in the amounts posted in the table below and on the Draft ERC Certificate in Appendix D.

Bankable Emission Reduction Credits (lb/Quarter)	
	PM10
1st Quarter	0
2nd Quarter	691
3rd Quarter	1,099
4th Quarter	154

List of Appendices

- A: Historical Hay Throughput Records
- B: Historical Actual Emissions Calculations
- C: Permit to Operate
- D: Draft Emission Reduction Credit Certificate

Appendix A

Historical Hay Throughput Records

Shafter Hay & Cube Daily Cubing Logs

May 2009

Jul. 25, 2011 10:30AM

WEGIS RANCH

	M	T	W	TH	F
Date					5-1-09
Hour Start					
Stop					Shut down
Total Tons					

	M	T	W	TH	F
Date	5-4	5-5	5-6	5-7	5-8
Hour Start	Shut down				
Stop	Shut down				
Total Tons					

	M	T	W	TH	F
Date	5-11	5-12	5-13	5-14	5-15
Hour Start	2 Am 12 Am	2-12	2-12	2-12	2-12
Stop					
Total Tons	150	150	150	150	150

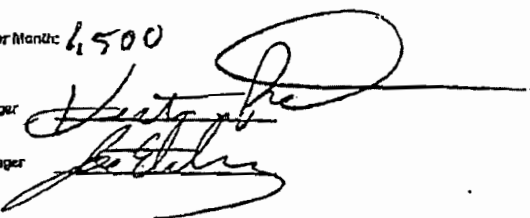
	TH	T	W	TH	F
Date	5-18	5-19	5-20	5-21	5-22
Hour Start	2-4m 12	2-12	2-12	2-12	2-12
Stop					
Total Tons	150	150	150	150	150

	M	T	W	TH	F
Date	5-25	5-26	5-27	5-28	5-29
Hour Start	Shut down				
Stop	Shut down				
Total Tons					

Total Tons Total Tons for Month: 6,500

Facility Manager

General Manager



No. 3411 P. 16

Shafter Kay & Cube Daily Cubing Logs

June 2009

	M	T	W	TH	F
Date	6-1-09	6-2	6-3	6-4	6-5
Hour Start	Shut	down	2am 11am	2-11	2-12
Stop					
Total Tons			150	150	150
	M	T	W	TH	F
Date	6-8	6-9	6-10	6-11	6-12
Hour Start	2am 11am	2-11	2-2	Shut	down
Stop					
Total Tons	150	150	70		
	M	T	W	TH	F
Date	6-15	6-16	6-17	6-18	6-19
Hour Start	2am 11am	2-12	2-12	2-12	2-12
Stop					
Total Tons	140	140	140	140	140
	M	T	W	TH	F
Date	6-22	6-23	6-24	6-25	6-26
Hour Start	2am 11am	2-11	2-12	2-12	Shut down
Stop					
Total Tons	140	140	140	140	
	M	T	W	TH	F
Date	6-29	6-30			
Hour Start	Shut down				
Stop					
Total Tons					

Total Tons Total Tons for Month: 2,080

Facility Manager

General Manager

[Handwritten signatures]

JUL. 25. 2011 10:30AM WEGIS RANCH

No. 3411 P. 17

Shafter Hay & Cube Daily Cubing Logs

July 2009

	M	T	W	TH	F
Date			7-1-09	7-2	7-3
Hour Start Stop			Shut	down	
Total Tons					

	M	T	W	TH	F
Date	7-6	7-7	7-8	7-9	7-10
Hour Start Stop	2Am 12Am	2-12	2-12	2-12	2-12
Total Tons	150	150	150	150	150

	M	T	W	TH	F
Date	7-13	7-14	7-15	7-16	7-17
Hour Start Stop	2Am 10Am	2-10	2-10	2-10	2-10
Total Tons	130	130	130	130	130

	M	T	W	TH	F
Date	7-20	7-21	7-22	7-23	7-24
Hour Start Stop	2Am 10Am	Shut	down		
Total Tons	130				

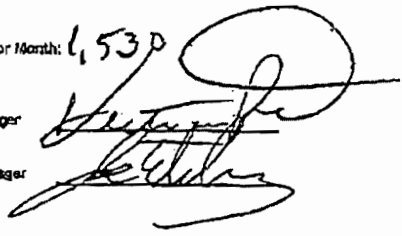
	M	T	W	TH	F
Date	7-27	7-28	7-29	7-30	7-31
Hour Start Stop	Shut	down			
Total Tons					

Total Tons

Total Tons for Month: 1,530

Facility Manager

General Manager



Jul. 25. 2011 10:30AM

WEGIS RANCH

No. 3411 P. 18

Shafter Hay & Cube Daily Cubing Logs

Aug. 2009

	M	T	W	TH	F
Date	8-3-09	8-4	8-5	8-6	8-7
Hour Start	2 AM	2-12	2-11	2-12	2-12
Stop	12 AM				
Total Tons	150	150	150	150	150
Date	8-10	8-11	8-12	8-13	8-14
Hour Start	2 AM	2-12	2-12	2-12	2-12
Stop	12				
Total Tons	150	150	150	150	150
Date	8-17	8-18	8-19	8-20	8-21
Hour Start	Shut	down		2 AM	2-10
Stop				10 AM	
Total Tons				120	120
Date	8-24	8-25	8-26	8-27	8-28
Hour Start	2 AM	2-10	Shut	down	
Stop	10 AM				
Total Tons	120	120			
Date	8-31				
Hour Start	Shut				
Stop	down				
Total Tons					

Total Tons

Total Tons for Month:

1,980

Facility Manager

General Manager

Shafter Hay & Cube Daily Cubing Logs

Sept. 2009

JUL 25, 2011 10:30AM WEGIS RANCH

	M	T	W	TH	F
Date		9-1-09	9-2	9-3	9-4
Hour Start					
Stop		shut down	down		
Total Tons					

	M	T	W	TH	F
Date	9-7	9-8	9-9	9-10	9-11
Hour Start					
Stop		shut down			
Total Tons					

	M	T	W	TH	F
Date	9-14	9-15	9-16	9-17	9-18
Hour Start					
Stop	5-0		2-12	2-12	2-12
Total Tons			140	140	140

	M	T	W	TH	F
Date	9-21	9-22	9-23	9-24	9-25
Hour Start					
Stop	2-AM 12 AM	2-12	2-12	2-12	2-12
Total Tons	140	140	140	140	140

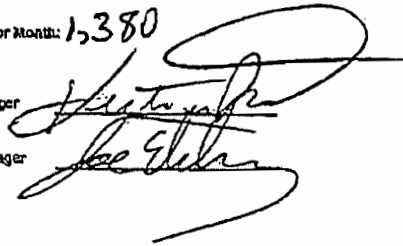
	M	T	W	TH	F
Date	9-28	9-29	9-30		
Hour Start					
Stop	2-AM 12 AM	2-12	shut down		
Total Tons	130	130			

Total Tons

Total Tons for Month: 1,380

Facility Manager

General Manager



No. 3411 P. 20

Shaffer Hay & Cube Daily Cubing Logs

Oct. 2009

	TR	T	W	TH	F
Date				10-1-09	10-2
Hour Start					
Stop				Shut down	
Total Tons					

	TR	T	W	TH	F
Date	10-5	10-6	10-7	10-8	10-9
Hour Start	2 AM	2-2	2-2	2-2	2-2
Stop	2 PM	2 PM	2-2	2-2	2-2
Total Tons	140	140	140	140	140

	TR	T	W	TH	F
Date	10-12	10-13	10-14	10-15	10-16
Hour Start	2 AM	2-2	2-2	2-2	2-2
Stop	2 PM	2-2	2-2	2-2	2-2
Total Tons		140	140	140	140

	M	T	W	TH	F
Date	10-19	10-20	10-21	10-22	10-23
Hour Start	2 AM	2-12			
Stop	11 AM		Shut down		
Total Tons	100	100			

	M	T	W	TH	F
Date	10-26	10-27	10-28	10-29	10-30
Hour Start					
Stop	Shut down				
Total Tons					

Total Tons

Total Tons for Month: 1,690

Facility Manager

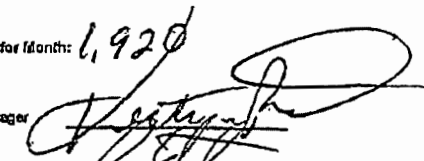
General Manager

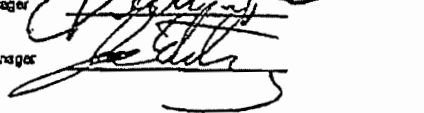
Shaffer Hay & Cube Daily Cubling Logs

May 2010

	M	T	W	TH	F
Date	5-3-10	5-4	5-5	5-6	5-7
Hour Start Stop	2-AM 10 AM	2-10	2-10	2-10	2-10
Total Tons	120	120	120	120	120
Date	5-10-10	5-11	5-12	5-13	5-14
Hour Start Stop	2 AM 10 AM	2-10	2-10	Shut down	
Total Tons	120	120	120		
Date	5-17-10	5-18	5-19	5-20	5-21
Hour Start Stop	Shut down		2 AM 10 AM	2-10	2-10
Total Tons			120	120	120
Date	5-24-10	5-25	5-26	5-27	5-28
Hour Start Stop	2 AM 10 AM	2-10	2-10	2-10	2-10
Total Tons	120	120	120	120	120
Date	5-31-10				
Hour Start Stop	S-O				
Total Tons					

Total Tons Total Tons for Month: 1,920

Facility Manager 

General Manager 

Shaffer Hay & Cube Daily Cublog Logs

June 2010

	M	T	W	TH	F
Date		6-1-10	6-2	6-3	6-4
Hour Start		Shut Down			
Stop		Shut Down			
Total Tons					
	M	T	W	TH	F
Date	6-7	6-8	6-9	6-10	6-11
Hour Start	2 AM	10 AM	2-10	2-10	2-10
Stop					
Total Tons	120	120	120	120	120
	M	T	W	TH	F
Date	6-14	6-15	6-16	6-17	6-18
Hour Start	2 AM	10 AM	2-10	2-10	2-10
Stop					
Total Tons	120	110	120	120	120
	M	T	W	TH	F
Date	6-21	6-22	6-23	6-24	6-25
Hour Start	2 AM	10 AM	2-10	2-10	2-10
Stop					Shut
Total Tons	120	120	120	120	
	M	T	W	TH	F
Date	6-28	6-29	6-30		
Hour Start	Shut Down				
Stop	Shut Down				
Total Tons					

Total Tons

Total Tons for Month: 1,680

Facility Manager

General Manager

JUL 25, 2011 10:31AM

WEGIS RANCH

No. 3411 P. 23

Shafter Key & Cube Daily Cubing Logs

July 2010

	M	T	W	TH	F
Date				7-1-10	7-2
Hour Start Stop				Shut down	---
Total Tons					

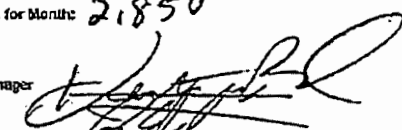
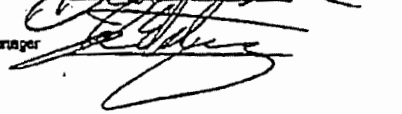
	M	T	W	TH	F
Date	7-5-10	7-6	7-7	7-8	7-9
Hour Start Stop	2 AM 12 AM	2-12	2-12	2-12	2-12
Total Tons	150	150	150	150	150

	M	T	W	TH	F
Date	7-12-10	7-13	7-14	7-15	7-16
Hour Start Stop	2 AM 12 AM	2-12	2-12	2-12	2-12
Total Tons	150	150	150	150	150

	M	T	W	TH	F
Date	7-19-10	7-20	7-21	7-22	7-23
Hour Start Stop	2 AM 12 AM	2-12	2-12	2-12	2-12
Total Tons	150	150	150	150	150

	M	T	W	TH	F
Date	7-26-10	7-27	7-28	7-29	7-30-10
Hour Start Stop	2 AM 12 AM	2-12	2-12	2-12	2-12
Total Tons	150	150	150	150	150

Total Tons Total Tons for Month: 2,1850

Facility Manager 
 General Manager 

Jul. 25. 2011 10:31AM WEGIS RANCH

No. 3411 P. 24

Shaffer Hay & Cube Daily Cubing Logs

Aug. 20/10

	Mon	Tue	Wed	Thu	Fri
Date	8-2-10	8-3	8-4	8-5	8-6
Hour Start					
Stop	Shut down				
Total Tons					

	Mon	Tue	Wed	Thu	Fri
Date	8-9-10	8-10	8-11	8-12	8-13
Hour Start	2 Am	2-12	2-12	2-12	2-12
Stop	12 Am				
Total Tons	150	150	150	150	150

	Mon	Tue	Wed	Thu	Fri
Date	8-16-10	8-17	8-18	8-19	8-20
Hour Start	2 Am	2-10	2-10	2-10	2-10
Stop	10 Am				
Total Tons	120	100	120	120	120

	Mon	Tue	Wed	Thu	Fri
Date	8-23-10	8-24	8-25	8-26	8-27
Hour Start	2 Am	2-10	2-10	Shut down	
Stop	10 Am				
Total Tons	120	120	110		

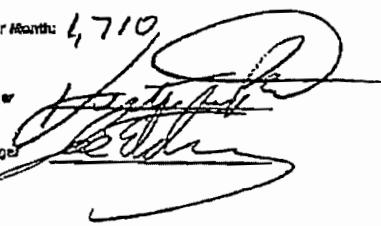
	Mon	Tue	Wed	Thu	Fri
Date	8-30-10	8-31-10			
Hour Start	Shut down				
Stop					
Total Tons					

Total Tons

Total Tons for Month: 4,710

Facility Manager

General Manager



Sept 2010

Shafter Hay & Cube Daily Cubing Logs

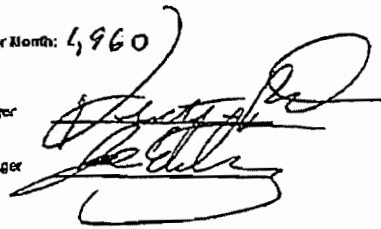
	Mon	Tue	Wed	Thu	Fri
Date			9-1	9-2	9-3
Hour Start Stop			Shut down		
Total Tons					
	Mon	Tue	Wed	Thu	Fri
Date	9-6	9-7	9-8	9-9	9-10
Hour Start Stop	2Am 12pm	2-12	2-12	2-12	2-12
Total Tons	140	140	140	140	140
	Mon	Tue	Wed	Thu	Fri
Date	9-13	9-14	9-15	9-16	9-17
Hour Start Stop	2Am 12pm	2-12	2-12	2-12	8-0
Total Tons	140	140	140	140	
	Mon	Tue	Wed	Thu	Fri
Date	9-20	9-21	9-22	9-23	9-24
Hour Start Stop	2-10	2-10	2-10	2-10	2-10
Total Tons	120	120	120	120	120
	Mon	Tue	Wed	Thu	Fri
Date	9-27	9-28	9-29	9-30	
Hour Start Stop	6Am 12	6-12			
Total Tons	50	50			

Total Tons

Total Tons for Month: 4,960

Facility Manager

General Manager



Appendix B

Historical Actual Emission Tabulation

		Monthly Throughput											
		Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09
S-210-1		0	0	0	0	1,500	2,080	1,530	1,980	1,380	1,600	0	0

		Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
S-210-1		0	0	0	0	1,920	1,680	2,850	1,710	1,960	0	0	0

		1st Quarter Average	2nd Quarter Average	3rd Quarter Average	4th Quarter Average
S-210-1		0	3,590	5,705	800

		1st Quarter Average Emissions	2nd Quarter Average Emissions	3rd Quarter Average Emissions	4th Quarter Average Emissions
S-210-1		0	768	1,221	171

		1st Quarter AQI Deduction	2nd Quarter AQI Deduction	3rd Quarter AQI Deduction	4th Quarter AQI Deduction
S-210-1		0	77	122	17

		1st Quarter Bankable Reductions	Reductions	3rd Quarter Bankable Reductions	4th Quarter Bankable Reductions
S-210-1		0	691	1,099	154

Appendix C

Permit to Operate

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-210-1-3

EXPIRATION DATE: 09/30/2015

EQUIPMENT DESCRIPTION:

HAY RECEIVING, CHOPPING, GRINDING, CUBING AND COOLING OPERATION CONSISTING OF TWO METER BOXES WITH CHOPPING BLADES, HAY BALE FEED CONVEYOR, ENCLOSED WARREN AND BAERG MODEL G272VRC-300 HAY BALE GRINDER, GRINDER DISCHARGE CONVEYOR, ENCLOSED MIXER, TWO HAY CUBERS AND ENCLOSED CUBE COOLER DISCHARGING VIA CONVEYORS TO STORAGE BARN. GRINDER, CHOPPERS, COOLER AND CUBERS ALL VENTED TO 50 INCH DIAMETER 1D-3D CYCLONE WHICH DISCHARGES COLLECTED FINES TO MIXER FEED CONVEYOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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]
3. All conveyors other than the bale feed conveyor shall be shielded from the wind. [District Rules 2201 and 4101]
4. Grinder feed and discharge openings shall be equipped with curtains to minimize particulate emissions. [District Rule 2201]
5. Operation shall include air legs from each meter box, cuber and cube cooler to operational cyclone. [District Rules 2201 and 4101]
6. Hay grinder shall be vented to operational cyclone. [District Rules 2201 and 4101]
7. Minimum control efficiency of the cyclone shall be 70 percent. [District Rule 2201]
8. The emission rate from this unit shall not exceed 0.214 lb-PM10 per ton of hay processed. [District Rule 2201]
9. The hay processing rate shall not exceed 150 tons-hay per day. [District Rule 2201]
10. Daily records of the tons of hay processed shall be maintained. [District Rule 1070]
11. 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, 4305, and 4306]

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

Facility Name: SHAFTER HAY & CUBE LLC
Location: 18650 WILDWOOD AVE, BUTTON/WILLOW, CA 93206
S-210-1-3; Aug 20 2010 11:14 AM - MCCOY

Appendix D

Draft Emission Reduction Credit Certificate

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate
S-3804-4

ISSUED TO: SHAFTER HAY & CUBE LLC
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 18650 WILDWOOD AVE
BUTTONWILLOW, CA 93206

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	691 lbs	1,099 lbs	154 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

Shutdown of grinding and cubing operation S-210-1-3

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