San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

OCT 25 2013

Ms. Debra Guzman
Director of Environmental Affairs
Saputo Cheese USA Inc.
800 E. Paige Avenue
Tulare, CA 93274

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # S-1203
Project # S-1122299

Dear Ms. Guzman:

Enclosed for your review is the District's analysis of Saputo Cheese USA Inc.'s application for the Federally Mandated Operating Permit for its operation at 800 E. Paige Avenue, Tulare, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

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

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

www.valleyair.org www.healthyairliving.com

SAN JOAQUIN VALLEY
UNIFIED AIR POLLUTION CONTROL DISTRICT

Saputo Cheese USA Inc.

PROPOSED ENGINEERING EVALUATION
TABLE OF CONTENTS

TITLE V APPLICATION REVIEW

Project #: S-1122299
Deemed Complete: July 11, 2012

Engineer: Ramon Norman
Date: July 22, 2013

Facility Number:	S-1203
Facility Name:	Saputo Cheese USA Inc.
Mailing Address:	800 E. Paige Avenue Tulare, CA 93274
Contact Name:	Debra Guzman
Phone:	(847) 400-6550
Email:	dguzman@saputo.com
Responsible Official:	Debra Guzman
Title:	Director of Environmental Affairs

I. PROPOSAL

Saputo Cheese USA Inc. is proposing that an initial Title V permit be issued for its existing cheese production facility in Tulare, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

Saputo Cheese USA Inc.'s cheese production facility is located at 800 E. Paige Avenue, Tulare, Tulare County, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has chosen to not use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant has not requested to utilize any model general permit templates. Therefore, the proposed permit in its entirety is subject to EPA and public review.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in the proposed Title V permit will be subject to EPA and public review.

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1081 - Source Sampling (amended December 16, 1993)

District Rule 1100 - Equipment Breakdown (amended December 17, 1992) (Non SIP replacement for Tulare County Rule 111)

District Rule 1160 - Emission Statements (adopted November 18, 1992)

District Rule 2010 - Permits Required (amended December 17, 1992)

District Rule 2020 - Exemptions (amended December 20, 2007 (SIP version of the Rule) ⇒ amended August 18, 2011)

District Rule 2031 - Transfer of Permits (amended December 17, 1992)

District Rule 2040 - Applications (amended December 17, 1992)

District Rule 2070 - Standards for Granting Applications (amended December 17, 1992)

District Rule 2080 - Conditional Approval (amended December 17, 1992)

District Rule 2201 - New and Modified Stationary Source Review Rule (amended April 21, 2011)

District Rule 2520 - Federally Mandated Operating Permits (amended June 21, 2001)

District Rule 4101 - Visible Emissions (amended February 17, 2005)

District Rule 4201 - Particulate Matter Concentration (amended December 17, 1992)

District Rule 4202 - Particulate Matter – Emission Rate (amended December 17, 1992)

District Rule 4301 - Fuel Burning Equipment (amended December 17, 1992)

District Rule 4305 - Boilers, Steam Generators, and Process Heaters – Phase 2 (amended August 21, 2003)

District Rule 4306 - Boilers, Steam Generators, and Process Heaters – Phase 3 (amended October 16, 2008)

District Rule 4309 - Dryers, Dehydrators, and Ovens (adopted December 15, 2005)

District Rule 4320 - Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (amended October 16, 2008)

District Rule 4351 - Boilers, Steam Generators, and Process Heaters – Phase 1 (amended August 21, 2003)

District Rule 4601 - Architectural Coatings (amended December 17, 2009)

District Rule 4701 - Internal Combustion Engines – Phase 1 (amended August 21, 2003)

District Rule 4702 - Internal Combustion Engines (amended January 18, 2007 (SIP version of the Rule) ⇒ amended August 18, 2011)

District Rule 4801 - Sulfur Compounds (amended December 17, 1992) (Non SIP replacement for Tulare County Rule 407)

District Rule 8011 - General Requirements (amended August 19, 2004)

District Rule 8021 - Construction, Demolition, Excavation, extraction, and Other Earthmoving Activities (amended August 19, 2004)

District Rule 8031 - Bulk Materials (amended August 19, 2004)

District Rule 8041 - Carryout and Trackout (amended August 19, 2004)

District Rule 8051 - Open Areas (amended August 19, 2004)

District Rule 8061 - Paved and Unpaved Roads (amended August 19, 2004)

District Rule 8071 - Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)

40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR Part 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

40 CFR Part 61 Subpart M - National Emission Standard for Asbestos

40 CFR Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

40 CFR Part 82 Subparts B & F - Stratospheric Ozone

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

1. District Rule 1070 - Inspections (amended December 17, 1992) (Replacement for Tulare County Rule 107)

The purpose of this rule is to explain the District's authority in determining compliance with District rules and regulations. District Rule 1070 had been submitted to the EPA to replace SIP-approved Tulare County APCD Rule 107. However, EPA subsequently removed Tulare County Rule 107 from the California SIP (see 40 CFR Section 52.220). Tulare County Rule 107 was

removed when EPA removed various rules describing the investigative and/or enforcement authority of local agencies from the SIP. EPA stated that the reason for removing these rules was that although states may need to adopt such rules to demonstrate adequate enforcement authority under the Clean Air Act, they should not be approved into the SIP to avoid potential conflicts with EPA's independent enforcement authority provided in the Clean Air Act. Although Tulare County Rule 107 is no longer contained in the SIP, the requirements in the rule are also contained in Sections 9.3, 9.4, and 13.2 of District Rule 2520, the District's Title V operating permit program, which has been approved by EPA; therefore, conditions referencing Rule 1070 will also reference Rule 2520 and remain Federally Enforceable through Title V.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

    - Conditions 6 and 42 of the requirements for this permit unit assure compliance with this rule.

b. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

    - Conditions 25-26 and 30 of the requirements for this permit unit assure compliance with this rule.

c. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

    - Condition 26 of the requirements for this permit unit assures compliance with this rule.

d. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

    - Conditions 21-22 of the requirements for this permit unit assure compliance with this rule.

e. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

- Condition 25 of the requirements for this permit unit assures compliance with this rule.

f. *S-1203-21-1: Steam-Heated Lactose Dryer Served by two Mullberry Hill C&E baghouses, equipped with a Lactose Mill Served by one Mullberry Hill C&E baghouse*

- Condition 16 of the requirements for this permit unit assures compliance with this rule.

g. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

- Condition 33 of the requirements for this permit unit assures compliance with this rule.

h. *S-1203-23-1: 3,500 cu ft Lactose Powder Silo with Bin Vent Filter (Receiving Product from the Kason Vibroscreen Sifter)*

- Condition 16 of the requirements for this permit unit assures compliance with this rule.

2. District Rule 4102 - <u>Nuisance</u> (amended December 17, 1992)

This rule prevents the discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or the public or which cause or have a natural tendency to cause injury or damage to business or property.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 38 of the requirements of the facility-wide permit assures compliance with this rule.

b. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

- Condition 3 of the requirements for this permit unit assures compliance with this rule.

c. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

- Conditions 8, 14-17, 19, and 29 of the requirements for this permit unit assure compliance with this rule.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

The applicant is not proposing to use any general permit templates. Compliance with all federally applicable requirements will be addressed in the following section of this engineering evaluation.

B. Requirements Not Addressed by Model General Permit Templates

1. District Rule 1081 – Source Sampling

The purpose of this rule is to ensure that any source operation that emits or may emit air contaminants provides adequate and safe facilities for use in sampling to determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

Section 3.1 requires that sampling port locations must be determined according to criteria in the California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing.

Section 3.2 requires that sampling platforms must be constructed according to specifications shown in the Air Resources Board publication entitled Supplement to Stationary Source Test Methods, Volume I, Appendix A, page 1-A-15.

Section 3.3 requires that in addition to the general industry safety orders of the State of California Title 14, Number 32776, Chapter 4, Subchapter

7, pertaining to ladders, all ladders accessing sampling platforms on any stack, chimney, or other structure will be caged and equipped with rest platforms at 20 foot intervals.

Section 4.0 requires that the owner of such a source operation, when requested by the APCO, shall provide records or other information, which will enable the APCO to determine when a representative sample can be taken. In addition, upon the request of the APCO and as directed by him, the owner of such a source operation shall collect, have collected, or allow the APCO to collect, a source sample.

Section 5.0 requires that the applicable test method, if not specified in the rule, shall be conducted in accordance with Title 40 CFR Subpart 60 Appendix A, except PM_{10} for compliance with Rule 2201 (New and Modified Stationary Source Review) requirements shall be conducted in accordance with Title 40 CFR Subpart 51, Appendix M, Method 201 or 201A. Where no test method exists in the preceding references for a source type, source sampling shall be conducted in accordance with CARB approved methods.

Section 6.1 requires that for the purpose of determining compliance with an applicable standard or numerical limitation, the arithmetic mean of three (3) test runs shall apply, unless two (2) of the three (3) results are above the applicable limit. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit.

Section 6.2 requires that a scheduled source test may not be discontinued solely due to the failure of one or more runs to meet applicable standards.

Section 6.3 requires that In the event that a sample is accidentally lost or conditions occur in which one (1) of the three (3) runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions presenting a hazard to the sampling team, or other circumstances beyond the owner or operators control, upon the APCO's approval, compliance may be determined using the arithmetic mean of the other two (2) runs.

Section 7.1 requires that the District must be notified 30 days prior to any compliance source testing and the owner shall submit a source test plan for District approval 15 days prior to source sampling.

Section 7.2 requires that source sampling to determine the compliance status of an emissions source shall be witnessed or authorized by District personnel.

Section 7.3 requires that Source test reports must be submitted to the District within 60 days of completion of field-testing. Source tests must be submitted for all District authorized compliance source tests regardless of pass, fail or reschedule because of failure, status. A District authorized compliance source test shall not be discontinued solely due to the failure of one (1) or more runs to meet applicable standards.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Conditions 8 and 18-19 of the requirements for this permit unit assure compliance with this rule.

b. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

   - Conditions 17 and 23 of the requirements for this permit unit assure compliance with this rule.

c. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

   - Conditions 5, 13, and 17 of the requirements for this permit unit assure compliance with this rule.

d. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

   - Conditions 17 and 22 of the requirements for this permit unit assure compliance with this rule.

e. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

   - Conditions 5, 21, and 28 of the requirements for this permit unit assure compliance with this rule.

2. District Rule 1100 – Equipment Breakdown

This rule defines a breakdown condition and the procedures to follow if one occurs. The corrective action, the issuance of an emergency variance, and the reporting requirements are also specified. Sections 6.0 and 7.0 set forth breakdown procedures and reporting requirements. District Rule 1100 has been submitted to the EPA to replace Tulare County Rule 111. District Rule 1100 is at least as stringent as the county SIP rule addressing breakdowns, as shown in Table 1 below.

Table 1: Comparison of District Rule 1100 to Tulare County Rule 111

REQUIREMENTS	District Rule 1100	Tulare County Rule 111
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	✓	✓
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	✓	✓
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	✓	✓
A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	✓	✓
A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	✓	✓
A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	✓	✓
Pictures of the equipment or controls which failed if available.	✓	✓

a. *S-1203-0-1: Facility-Wide Requirements*

- Conditions 1, 2, and 11 of the requirements of the facility-wide permit assure compliance with this rule.

3. District Rule 1160 - Emission Statements

The purpose of this rule is to provide the District with an accurate accounting of emissions from significant sources with which the District and California EPA Air Resources Board (ARB) can compile an accurate inventory. Section 5.0 requires the owner or operator of any stationary

source to provide the District with a written emissions statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NO_X) from that source. The District may waive this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the ARB with an emissions inventory of sources emitting greater than 10 tons per year of NO_X or ROGs based on the use of emission factors acceptable to the ARB.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 3 of the requirements of the facility-wide permit assures compliance with this rule.

4. District Rule 2010 – Permits Required

Sections 3.0 and 4.0 of District Rule 2010 require any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 4 of the requirements of the facility-wide permit assures compliance with this rule.

5. District Rule 2020 – Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions.

District Rule 2020 was last amended on August 18, 2011. The primary purpose of the amendment was to correct a deficiency noted by EPA regarding referencing the California Health and Safety Code (CH&SC) as part of the exemption for agricultural sources. On May 11, 2010, EPA finalized a limited approval and limited disapproval of District Rule 2020 because the permitting exemption for agricultural sources referenced the CH&SC where the State law has not been submitted for inclusion in the SIP. On August 18, 2011, the District amended Rule 2020 to address this deficiency by replacing the reference to the CH&SC with clear wording explaining that the exemption applied to agricultural sources with emissions less than one-half of the major source thresholds and that are not required to obtain Title V permits pursuant to District Rule 2520. The amendment also added a definition for agricultural sources and included

an exemption for wind machines, which are only used a few nights a year to protect certain crops (e.g. citrus) from frost when temperatures are predicted to drop below 28 °F and have and have been treated as insignificant sources of emissions. On December 6, 2011, EPA proposed to approve the August 18, 2011 version of District Rule 2020 into the SIP (76 FR 76112). Because the amendments to District Rule 2020 do not affect the requirements for the permit units at this facility, the changes will not be addressed further in this evaluation.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 4 of the requirements of the facility-wide permit assures compliance with this rule.

6. District Rule 2031 – Transfer of Permits

District Rule 2031 prohibits the transfer of Permits to Operate or Authorities to Construct from one location to another, from one piece of equipment to another, or from one person to another unless a new application is filed with and approved by the District.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 6 of the requirements of the facility-wide permit assures compliance with this rule.

7. District Rule 2040 – Applications

The purpose of this rule is to explain the procedures for filing, denying, and appealing the denial of applications for an Authority to Construct or a Permit to Operate.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 7 of the requirements of the facility-wide permit assures compliance with this rule.

8. District Rule 2070 – Standards for Granting Applications

District Rule 2070 requires sources to be constructed and operated as specified in the Authority to Construct and the Permit to Operate and requires that source comply with the applicable requirements of District Rule 2201 (New and Modified Stationary Source Review Rule), District Rule 4001 (New Source Performance Standards), and District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants). District

Rule 2070 also explains the standards by which an APCO may deny an application for an Authority to Construct or Permit to Operate.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 5 of the requirements of the facility-wide permit assures compliance with this rule.

9. District Rule 2080 - Conditional Approval

District Rule 2080 grants the Air Pollution Control Officer (APCO) the authority to issue or revise specific written conditions on an Authority to Construct or a Permit to Operate to assure compliance with emission standards or limitations.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 5 of the requirements of the facility-wide permit assures compliance with this rule.

b. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

- Conditions 1-5 of the requirements for this permit unit assure compliance with this rule.

10. District Rule 2201 - New and Modified Stationary Source Review

District Rule 2201 applies to new and modifying sources that require a District permit. The permit units were subject to the District Rule 2201 upon application for Authority to Construct (ATC).

In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting Permit to Operate (PTO) were addressed to define how NSR permit terms should be incorporated into the Title V permit.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

- Conditions 1-6 from the PTO have been included as conditions 1-6 of the proposed requirements for permit unit -8-8.
- Condition 7 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Condition 8 from the PTO has been included as condition 7 of the proposed requirements for permit unit -8-8.
- Conditions 9-13 from the PTO have been included as conditions 9-13 of the proposed requirements for permit unit -8-8.
- The requirements of condition 14 from the PTO have been included as condition 14 of the proposed requirements for permit unit -8-8.
- Conditions 15-23 from the PTO have been included as conditions 15-23 of the proposed requirements for permit unit -8-8.
- Conditions 24-35 from the PTO have been included as conditions 25-26 of the proposed requirements for permit unit -8-8.
- Condition 36 from the PTO has been included as condition 42 of the proposed requirements for permit unit -8-8.

b. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-15 from the PTO have been included as conditions 1-14 of the proposed requirements for permit unit -9-6.
- The requirements of condition 16 from the PTO have been included as condition 16 of the proposed requirements for permit unit -9-6.
- Condition 17 from the PTO has been included as condition 15 of the proposed requirements for permit unit -9-6.
- Conditions 18-28 from the PTO have been included as conditions 17-27 of the proposed requirements for permit unit -9-6.
- Condition 29 from the PTO has been included as condition 30 of the proposed requirements for permit unit -9-6.

c. *S-1203-10-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "A" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-3 from the PTO have been included as conditions 2-3 of the proposed requirements for permit unit -10-2.
- Condition 4 from the PTO has been included as condition 1 of the proposed requirements for permit unit -10-2.
- Condition 5 from the PTO has been included as condition 4 of the proposed requirements for permit unit -10-2.
- Condition 6 from the PTO has been included as condition 9 of the proposed requirements for permit unit -10-2.

d. *S-1203-11-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "B" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-3 from the PTO have been included as conditions 2-3 of the proposed requirements for permit unit -11-2.
- Condition 4 from the PTO has been included as condition 1 of the proposed requirements for permit unit -11-2.
- Condition 5 from the PTO has been included as condition 4 of the proposed requirements for permit unit -11-2.
- Condition 6 from the PTO has been included as condition 9 of the proposed requirements for permit unit -11-2.

e. *S-1203-12-2: 26,162 Gallon (3,500 Cu. Ft.) Whey Powder Storage Silo "C" with Bin Vent, 3 hp Power Silo Bin Discharger, 2 hp Exhaust Fan, and 1 hp Convey-Thru Rotary Airlock*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-4 from the PTO have been included as conditions 1-3 of the proposed requirements for permit unit -12-2.
- Condition 5 from the PTO has been included as condition 8 of the proposed requirements for permit unit -12-2.

f. *S-1203-13-1: Avapac Bulk Bag Filling System including Model C-63-00 Bulk Bag Filling Machine, 350 Cubic Foot Surge Hopper with Nucon Bin Vent Served by a Model NCRD 102-100-3T Dust Collector Shared with S-1203-14 and S-1203-15*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-8 from the PTO have been included as conditions 2-8 of the proposed requirements for permit unit -13-1.
- Condition 9 from the PTO has been included as condition 13 of the proposed requirements for permit unit -13-1.

g. *S-1203-14-1: Avapac Carousel Bag Filling System Served by Dust Collector System listed on Permit S-1203-13*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-8 from the PTO have been included as conditions 2-8 of the proposed requirements for permit unit -14-1.
- Condition 9 from the PTO has been included as condition 13 of the proposed requirements for permit unit -14-1.

h. *S-1203-15-1: Avapac Inline Bag Filling System including 350 Cubic Foot Powder Surge Hopper Served by Dust Collector System listed on Permit S-1203-13*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-8 from the PTO have been included as conditions 2-8 of the proposed requirements for permit unit -15-1.
- Condition 9 from the PTO has been included as condition 13 of the proposed requirements for permit unit -15-1.

i. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-5 from the PTO have been included as conditions 1-4 of the proposed requirements for permit unit -16-4.
- Conditions 6-12 from the PTO have been included as conditions 6-12 of the proposed requirements for permit unit -16-4.

- The requirements of condition 13 from the PTO have been included as condition 5 of the proposed requirements for permit unit -16-4.
- Condition 14 from the PTO has been included as condition 13 of the proposed requirements for permit unit -16-4.
- The requirements of condition 15 from the PTO have been included as condition 14 of the proposed requirements for permit unit -16-4.
- Conditions 16-21 from the PTO have been included as conditions 15-20 of the proposed requirements for permit unit -16-4.
- Conditions 22-24 from the PTO have been included as conditions 22-24 of the proposed requirements for permit unit -16-4.
- Condition 25 from the PTO has been included as condition 26 of the proposed requirements for permit unit -16-4.

j. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

- Conditions 1-2 from the PTO have been included as conditions 5-6 of the proposed requirements for permit unit -17-2.
- Condition 3 from the PTO has been included as condition 8 of the proposed requirements for permit unit -17-2.
- Conditions 4-5 from the PTO have been included as conditions 3-4 of the proposed requirements for permit unit -17-2.
- Condition 6 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Condition 7 from the PTO has been included as condition 9 of the proposed requirements for permit unit -17-2.
- Condition 8 from the PTO has been included as condition 11 of the proposed requirements for permit unit -17-2.
- Condition 9 from the PTO has been included as condition 10 of the proposed requirements for permit unit -17-2.
- Conditions 10-11 from the PTO have been included as conditions 12-13 of the proposed requirements for permit unit -17-2.
- Conditions 12-13 from the PTO have been included as conditions 1-2 of the proposed requirements for permit unit -17-2.
- Condition 14 from the PTO has been included as condition 7 of the proposed requirements for permit unit -17-2.
- Condition 15 from the PTO has been included as condition 14 of the proposed requirements for permit unit -17-2.
- Condition 16 from the PTO has been included as condition 22 of the proposed requirements for permit unit -17-2.

k. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-5 from the PTO have been included as conditions 1-4 of the proposed requirements for permit unit -20-4.
- Conditions 6-12 from the PTO have been included as conditions 6-12 of the proposed requirements for permit unit -20-4.
- The requirements of condition 13 from the PTO has been included as condition 13 of the proposed requirements for permit unit -20-4.
- The requirements of condition 14 from the PTO have been included as condition 5 of the proposed requirements for permit unit -20-4. The requirements have been corrected to reference PUC-regulated natural gas rather than commercial propane.
- Conditions 15-24 from the PTO have been included as conditions 14-23 of the proposed requirements for permit unit -20-4.
- Condition 25 from the PTO has been included as condition 25 of the proposed requirements for permit unit -20-4.

l. *S-1203-21-1: Steam-Heated Lactose Dryer Served by two Mullberry Hill C&E baghouses, equipped with a Lactose Mill Served by one Mullberry Hill C&E baghouse*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-9 from the PTO have been included as conditions 2-9 of the proposed requirements for permit unit -21-1.
- Condition 10 from the PTO has been included as condition 1 of the proposed requirements for permit unit -21-1.
- Conditions 11-14 from the PTO have been included as conditions 10-13 of the proposed requirements for permit unit -21-1.
- Condition 15 from the PTO has been included as condition 16 of the proposed requirements for permit unit -21-1.

m. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.

- Conditions 2-4 from the PTO have been included as conditions 3-5 of the proposed requirements for permit unit -22-1.
- Condition 5 from the PTO has been included as condition 2 of the proposed requirements for permit unit -22-1.
- Condition 6 from the PTO has been included as condition 1 of the proposed requirements for permit unit -22-1.
- Conditions 7-18 from the PTO have been included as conditions 6-17 of the proposed requirements for permit unit -22-1.
- The requirements of condition 19 from the PTO have been included as condition 18 of the proposed requirements for permit unit -22-1.
- Conditions 20-25 from the PTO have been included as conditions 19-24 of the proposed requirements for permit unit -22-1.
- Conditions 26-28 from the PTO have been included as conditions 26-28 of the proposed requirements for permit unit -22-1.
- Condition 29 from the PTO required that notification be sent to the District of the date of construction, anticipated startup, and actual startup. This condition 29 was not included in the proposed requirements for permit unit -22-1 since the startup has been completed and the condition is no longer applicable.
- Condition 30 from the PTO has been included as condition 29 of the proposed requirements for permit unit -22-1.
- The requirements of condition 31 from the PTO has been included as condition 30 of the proposed requirements for permit unit -22-1.
- Conditions 32-34 from the PTO have been included as conditions 31-33 of the proposed requirements for permit unit -22-1.

n. *S-1203-23-1: 3,500 cu ft Lactose Powder Silo with Bin Vent Filter (Receiving Product from the Kason Vibroscreen Sifter)*

- Condition 1 from the PTO is not federally enforceable. It is included as condition 39 of the proposed facility-wide permit.
- Conditions 2-8 from the PTO have been included as conditions 2-8 of the proposed requirements for permit unit -23-1.
- Condition 9 from the PTO has been included as condition 1 of the proposed requirements for permit unit -23-1.
- Conditions 10-12 from the PTO have been included as conditions 9-11 of the proposed requirements for permit unit -23-1.
- Condition 13 from the PTO has been included as condition 16 of the proposed requirements for permit unit -23-1.

11. District Rule 2520 - Federally Mandated Operating Permits

The purpose of this rule is to provide for the following: an administrative mechanism for issuing operating permits for new and modified sources of

air contaminants in accordance with requirements of 40 CFR Part 70; an administrative mechanism for issuing renewed operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70; an administrative mechanism for revising, reopening, revoking, and terminating operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70; an administrative mechanism for incorporating requirements authorized by preconstruction permits issued under District Rule 2201 (New and Modified Stationary Source Review) in a Part 70 permit as administrative amendments, provided that such permits meet the necessary procedural and compliance requirements.

Section 5.2 of District Rule 2520 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit

Section 9.1.1 of District Rule 2520 requires all conditions on Title V permits specify a reference of the origin of an authority for each term or condition, and identify any difference in form as compared to the applicable requirements upon which the term or condition is based.

Section 9.3.2 of District Rule 2520 requires that each permit contain periodic monitoring or testing to assure compliance with federally enforceable emission limits or other requirements if none is associated with the applicable requirement. Recordkeeping may be sufficient to meet the requirements of this section. Monitoring and recordkeeping requirements have been incorporated into the permit as appropriate.

Section 9.4 contains requirements to incorporate all applicable recordkeeping requirements into the Title V permit. This section also specifies records of any required monitoring and support data be kept for a period of five years.

Section 9.5 of District Rule 2520 requires the submittal of monitoring reports at least every six months. Prompt reporting of deviations from permitting requirements, including those attributable to upset conditions is also required. The responsible official must certify all required reports.

Section 9.7 states that the Title V permit must contain a severability clause in the event of challenge to any portion of the permit.

Section 9.8 of District Rule 2520 contains requirements for provisions in the Title V permit stating the following: 1) the permittee must comply with

all permit conditions. Noncompliance with permit conditions constitutes a violation of the Clean Air Act and District Rules and Regulations, and is grounds for enforcement action; 2) it should not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit; 3) the permit may be revoked, modified, reissued, or reopened for cause; 4) the Title V permit does not convey any property rights of any sort or reflect any exclusive privilege, and 5) the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit.

Section 9.9 of District Rule 2520 requires the permit specify that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120.

Section 9.13.1 of District Rule 2520 requires any report or document submitted under a permit requirement or a request for information by the District or EPA contain a certification by a responsible official as to truth, accuracy, and completeness.

Section 9.13.2 of District Rule 2520 contains inspection and entry requirements that allows an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements.

Section 9.14.1 of District Rule 2520 requires that, for sources in violation of an applicable requirement, a schedule of compliance be included in the Title V permit. This source has not been determined to be in violation of any applicable requirements.

Section 9.16 of District Rule 2520 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District).

Section 10.0 of District Rule 2520 requires any application form, report, or compliance certification submitted pursuant to these regulations shall contain certification of truth, accuracy and completeness by a responsible official.

Greenhouse Gas Requirements

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas

Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

a. *S-1203-0-1: Facility-Wide Requirements*

- Conditions 5, 8-21, 26, 38, and 40 of the requirements of the facility-wide permit assure compliance with this rule.

b. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

- Conditions 6, 37-40, and 42 of the requirements for this permit unit assure compliance with this rule.

c. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

- Conditions 25-26 and 28-30 of the requirements for this permit unit assure compliance with this rule.

d. *S-1203-10-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "A" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

- Conditions 5-9 of the requirements for this permit unit assure compliance with this rule.

e. *S-1203-11-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "B" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

- Conditions 5-9 of the requirements for this permit unit assure compliance with this rule.

f. *S-1203-12-2: 26,162 Gallon (3,500 Cu. Ft.) Whey Powder Storage Silo "C" with Bin Vent, 3 hp Power Silo Bin Discharger, 2 hp Exhaust Fan, and 1 hp Convey-Thru Rotary Airlock*

   - Conditions 4-8 of the requirements for this permit unit assure compliance with this rule.

g. *S-1203-13-1: Avapac Bulk Bag Filling System including Model C-63-00 Bulk Bag Filling Machine, 350 Cubic Foot Surge Hopper with Nucon Bin Vent Served by a Model NCRD 102-100-3T Dust Collector Shared with S-1203-14 and S-1203-15*

   - Conditions 9-12 of the requirements for this permit unit assure compliance with this rule.

h. *S-1203-14-1: Avapac Carousel Bag Filling System Served by Dust Collector System listed on Permit S-1203-13*

   - Conditions 9-12 of the requirements for this permit unit assure compliance with this rule.

i. *S-1203-15-1: Avapac Inline Bag Filling System including 350 Cubic Foot Powder Surge Hopper Served by Dust Collector System listed on Permit S-1203-13*

   - Conditions 9-12 of the requirements for this permit unit assure compliance with this rule.

j. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

   - Conditions 24 and 26 of the requirements for this permit unit assure compliance with this rule.

k. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

   - Conditions 14 and 21-22 of the requirements for this permit unit assure compliance with this rule.

l. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

- Conditions 23 and 25 of the requirements for this permit unit assure compliance with this rule.

m. *S-1203-21-1: Steam-Heated Lactose Dryer Served by two Mullberry Hill C&E baghouses, equipped with a Lactose Mill Served by one Mullberry Hill C&E baghouse*

- Conditions 14-16 of the requirements for this permit unit assure compliance with this rule.

n. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

- Conditions 32-33 of the requirements for this permit unit assure compliance with this rule.

o. *S-1203-23-1: 3,500 cu ft Lactose Powder Silo with Bin Vent Filter (Receiving Product from the Kason Vibroscreen Sifter)*

- Conditions 12-16 of the requirements for this permit unit assure compliance with this rule.

12. District Rule 4101 – Visible Emissions

The purpose of this rule is to prohibit the emissions of visible air contaminants to the atmosphere. Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 22 of the requirements of the facility-wide permit assures compliance with this rule.

b. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Condition 33 of the requirements for this permit unit assures compliance with this rule.

c. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

   - Condition 1 of the requirements for this permit unit assures compliance with this rule.

d. *S-1203-10-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "A" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

   - Condition 1 of the requirements for this permit unit assures compliance with this rule.

e. *S-1203-11-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "B" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

   - Condition 1 of the requirements for this permit unit assures compliance with this rule.

f. *S-1203-12-2: 26,162 Gallon (3,500 Cu. Ft.) Whey Powder Storage Silo "C" with Bin Vent, 3 hp Power Silo Bin Discharger, 2 hp Exhaust Fan, and 1 hp Convey-Thru Rotary Airlock*

   - Condition 1 of the requirements for this permit unit assures compliance with this rule.

g. *S-1203-13-1: Avapac Bulk Bag Filling System including Model C-63-00 Bulk Bag Filling Machine, 350 Cubic Foot Surge Hopper with Nucon Bin Vent Served by a Model NCRD 102-100-3T Dust Collector Shared with S-1203-14 and S-1203-15*

   - Condition 5 of the requirements for this permit unit assures compliance with this rule.

h. *S-1203-14-1: Avapac Carousel Bag Filling System Served by Dust Collector System listed on Permit S-1203-13*

- Condition 5 of the requirements for this permit unit assures compliance with this rule.

i. *S-1203-15-1: Avapac Inline Bag Filling System including 350 Cubic Foot Powder Surge Hopper Served by Dust Collector System listed on Permit S-1203-13*

- Condition 5 of the requirements for this permit unit assures compliance with this rule.

j. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

k. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

- Condition 2 of the requirements for this permit unit assures compliance with this rule.

l. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

m. *S-1203-21-1: Steam-Heated Lactose Dryer Served by two Mullberry Hill C&E baghouses, equipped with a Lactose Mill Served by one Mullberry Hill C&E baghouse*

- Condition 10 of the requirements for this permit unit assures compliance with this rule.

n. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

- Condition 2 of the requirements for this permit unit assures compliance with this rule.

o. *S-1203-23-1: 3,500 cu ft Lactose Powder Silo with Bin Vent Filter (Receiving Product from the Kason Vibroscreen Sifter)*

- Condition 8 of the requirements for this permit unit assures compliance with this rule.

13. District Rule 4201 - Particulate Matter Concentration

The purpose of this rule is to protect the ambient air quality by establishing a particulate matter emission standard. Section 3.0 prohibits the discharge into the atmosphere of dust, fumes, or total suspended particulate matter from any single source operation in excess of 0.1 grain per cubic foot of gas at dry standard conditions.

Natural Gas-Fired External Combustion Units
The following calculation demonstrates that particulate matter emissions from the natural gas-fired driers and boilers will not exceed the rule limit of 0.1 grain per cubic foot of gas at dry standard conditions.

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate; therefore, the following calculations use uncorrected emissions to represent the worst-case particulate matter emissions.

$$\left(\frac{7.6\,\text{lb - PM}}{10^6\ ft^3}\right)X\left(\frac{1\,\text{scf}}{1{,}000\,\text{Btu}}\right)X\left(\frac{10^6\,Btu}{8{,}578\,\text{dscf}}\right)X\left(\frac{7{,}000\,\text{gr}}{1\,\text{lb}}\right)=0.006\frac{grain}{dscf}$$

Where:

7.6 lb-PM/10^6 scf - PM emission factor for external combustion of natural gas (AP-42, Table 1.4-2, 7/1998)

1,000 Btu/scf - Heating value of Natural Gas from District Policy APR-1720 (12/20/2001) (This value is more conservative than the value of 1,020 Btu/scf given in AP-42, Chapter 1.4 (7/1998) for external combustion of natural gas)

8,578 dscf/10^6 Btu - Oxygen-Based F Factor, Dry Basis for Natural Gas @ 60 °F (40 CFR 60, Appendix A-7, Table 19-2; 8,710 dscf/10^6 Btu @ 68 °F)

7,000 gr/lb - Conversion Factor for lb to grain (AP-42, Appendix A, 9/1985 (reformatted 1/1995))

0.006 gr/dscf < 0.1 gr/dscf; therefore, natural gas-fired external combustion units are expected to comply with the particulate matter concentration limit of this rule.

LPG-Fired External Combustion Units

The following calculation demonstrates that particulate matter emissions from the driers and boilers when fired on LPG will not exceed the rule limit of 0.1 grain per cubic foot of gas at dry standard conditions.

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate; therefore, the following calculations use uncorrected emissions to represent the worst-case particulate matter emissions.

Propane

$$\left(\frac{0.7\text{ lb - PM}}{10^3\ gal}\right)X\left(\frac{10^3\ gal}{91.5\text{ x }10^6\ Btu}\right)X\left(\frac{10^6\ Btu}{8{,}578\text{ dscf}}\right)X\left(\frac{7{,}000\text{ gr}}{1\text{ lb}}\right)=0.006\frac{grain}{dscf}$$

Butane

$$\left(\frac{0.8\text{ lb - PM}}{10^3\ gal}\right)X\left(\frac{10^3\ gal}{102\text{ x }10^6\ Btu}\right)X\left(\frac{10^6\ Btu}{8{,}578\text{ dscf}}\right)X\left(\frac{7{,}000\text{ gr}}{1\text{ lb}}\right)=0.006\frac{grain}{dscf}$$

Where:

0.7 lb-PM/10^3 gal - PM emission factor for external combustion of propane (AP-42, Table 1.5-1, 7/2008)

0.8 lb-PM/10^3 gal - PM emission factor for external combustion of Butane (AP-42, Table 1.5-1, 7/2008)

91.5 x 10^6 Btu/10^3 gal - Heating value of Propane (AP-42, Chapter 1.5 – Liquefied Petroleum Gas Combustion, 7/2008)

102 x 10^6 Btu/10^3 gal - Heating value of Butane (AP-42, Chapter 1.5 – Liquefied Petroleum Gas Combustion, 7/2008)

8,578 dscf/10^6 Btu - Oxygen-Based F Factor, Dry Basis for Propane and Butane @ 60 °F (40 CFR 60, Appendix A-7, Table 19-2; 8,710 dscf/10^6 Btu @ 68 °F)

7,000 gr/lb - Conversion Factor for lb to grain (AP-42, Appendix A, 9/1985 (reformatted 1/1995))

0.006 gr/dscf < 0.1 gr/dscf; therefore, LPG-fired external combustion units are expected to comply with the particulate matter concentration limit of this rule.

<u>Natural Gas/LPG-Fired 4-Stroke Internal Combustion (IC) Engines</u>
The following calculation demonstrates that particulate matter emissions from natural gas-fired 4-stroke IC engines will not exceed the rule limit of 0.1 grain per cubic foot of gas at dry standard conditions. Particulate matter emissions from gaseous fired-IC engines are also very low and particulate matter emissions from LPG-fired engines are expected to be similar to natural gas-fired IC engines on a heating value basis; therefore, the calculation below is also applicable to the engine when-fired on LPG.

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate; therefore, the following calculations use uncorrected emissions to represent the worst-case particulate matter emissions.

$$\left(\frac{0.01941\,\text{lb - PM}}{10^6\,Btu}\right)X\left(\frac{10^6\,Btu}{8{,}578\,\text{dscf}}\right)X\left(\frac{7{,}000\,\text{gr}}{1\,\text{lb}}\right)=0.016\,\frac{grain}{dscf}$$

Where:

0.01941 lb-PM/10^6 Btu - Total Uncontrolled PM emission factor (filterable and condensable PM) for natural gas-fired 4-stroke rich burn IC engines (AP-42, Table 3.2-3, 7/2000) (the AP-42 PM emission factor for rich burn engines was used since it is higher than the AP-42 PM emission factor for lean burn engines)

8,578 dscf/10^6 Btu - Oxygen-Based F Factor, Dry Basis for Natural Gas @ 60 °F (40 CFR 60, Appendix A-7, Table 19-2; 8,710 dscf/10^6 Btu @ 68 °F)

7,000 gr/lb - Conversion Factor for lb to grain (AP-42, Appendix A, 9/1985 (reformatted 1/1995))

0.016 gr/dscf < 0.1 gr/dscf; therefore, the natural gas/LPG-fired 4-stroke IC engine is expected to comply with the particulate matter concentration limit of this rule.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Condition 7 of the requirements for this permit unit assures compliance with this rule.

b. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

   - Condition 2 of the requirements for this permit unit assures compliance with this rule.

c. *S-1203-10-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "A" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

   - Condition 4 of the requirements for this permit unit assures compliance with this rule.

d. *S-1203-11-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "B" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

   - Condition 4 of the requirements for this permit unit assures compliance with this rule.

e. *S-1203-12-2: 26,162 Gallon (3,500 Cu. Ft.) Whey Powder Storage Silo "C" with Bin Vent, 3 hp Power Silo Bin Discharger, 2 hp Exhaust Fan, and 1 hp Convey-Thru Rotary Airlock*

   - Condition 2 of the requirements for this permit unit assures compliance with this rule.

f. *S-1203-13-1: Avapac Bulk Bag Filling System including Model C-63-00 Bulk Bag Filling Machine, 350 Cubic Foot Surge Hopper with Nucon Bin Vent Served by a Model NCRD 102-100-3T Dust Collector Shared with S-1203-14 and S-1203-15*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

g. *S-1203-14-1: Avapac Carousel Bag Filling System Served by Dust Collector System listed on Permit S-1203-13*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

h. *S-1203-15-1: Avapac Inline Bag Filling System including 350 Cubic Foot Powder Surge Hopper Served by Dust Collector System listed on Permit S-1203-13*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

i. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

- Condition 2 of the requirements for this permit unit assures compliance with this rule.

j. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

k. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

- Condition 2 of the requirements for this permit unit assures compliance with this rule.

l. *S-1203-21-1: Steam-Heated Lactose Dryer Served by two Mullberry Hill C&E baghouses, equipped with a Lactose Mill Served by one Mullberry Hill C&E baghouse*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

m. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

n. *S-1203-23-1: 3,500 cu ft Lactose Powder Silo with Bin Vent Filter (Receiving Product from the Kason Vibroscreen Sifter)*

- Condition 1 of the requirements for this permit unit assures compliance with this rule.

14. District Rule 4202 - Particulate Matter Emission Rate

The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates. The calculation methods for determining the emission rate based on process weight are specified.

Section 4.0 prohibits the discharge of particulate matter emissions from any source operation in excess of the limits calculated by the following formula:

$E = 3.59\ P^{0.62}$ for P less than or equal to 30 tons/hr

$E = 17.31\ P^{0.16}$ for P greater than 30 tons/hr

where:
E = Emission in lbs/hr
P = Process weight rate in tons/hr

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Condition 11 of the requirements for this permit unit assures compliance with this rule.

b. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

   - Condition 8 of the requirements for this permit unit assures compliance with this rule.

c. *S-1203-10-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "A" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

   - Conditions 2 and 4 of the requirements for this permit unit assure compliance with this rule.

d. *S-1203-11-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "B" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

   - Conditions 2 and 4 of the requirements for this permit unit assure compliance with this rule.

e. *S-1203-12-2: 26,162 Gallon (3,500 Cu. Ft.) Whey Powder Storage Silo "C" with Bin Vent, 3 hp Power Silo Bin Discharger, 2 hp Exhaust Fan, and 1 hp Convey-Thru Rotary Airlock*

   - Conditions 2 and 3 of the requirements for this permit unit assure compliance with this rule.

f. *S-1203-13-1: Avapac Bulk Bag Filling System including Model C-63-00 Bulk Bag Filling Machine, 350 Cubic Foot Surge Hopper with Nucon Bin Vent Served by a Model NCRD 102-100-3T Dust Collector Shared with S-1203-14 and S-1203-15*

   - Condition 8 of the requirements for this permit unit assures compliance with this rule.

g. *S-1203-14-1: Avapac Carousel Bag Filling System Served by Dust Collector System listed on Permit S-1203-13*

- Condition 8 of the requirements for this permit unit assures compliance with this rule.

h. *S-1203-15-1: Avapac Inline Bag Filling System including 350 Cubic Foot Powder Surge Hopper Served by Dust Collector System listed on Permit S-1203-13*

- Condition 8 of the requirements for this permit unit assures compliance with this rule.

i. *S-1203-21-1: Steam-Heated Lactose Dryer Served by two Mullberry Hill C&E baghouses, equipped with a Lactose Mill Served by one Mullberry Hill C&E baghouse*

- Condition 11 of the requirements for this permit unit assures compliance with this rule.

j. *S-1203-23-1: 3,500 cu ft Lactose Powder Silo with Bin Vent Filter (Receiving Product from the Kason Vibroscreen Sifter)*

- Condition 9 of the requirements for this permit unit assures compliance with this rule.

15. District Rule 4301 – Fuel Burning Equipment

The purpose of this rule is to limit the emission of air contaminants from fuel burning equipment. This rule limits the concentration of combustion contaminants and specifies maximum emission rates for sulfur dioxide, nitrogen oxide and combustion contaminant emissions. Pursuant to District Rule 1020, Section 3.12, combustion contaminants are defined as: particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state.

This rule applies to any fuel burning equipment except air pollution control equipment. Section 3.1 of the rule defines fuel burning equipment as: 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.

Section 5.1 prohibits the discharge into the atmosphere combustion contaminants (PM) exceeding in concentration at the point of discharge,

0.1 grain per cubic foot of gas calculated to 12% of carbon dioxide at dry standard conditions.

Natural Gas-Fired Fuel Burning Equipment
The following calculation demonstrates that particulate matter emissions from fuel burning equipment fired on natural gas will not exceed the rule limit of 0.1 grain per cubic foot of gas calculated to 12% of carbon dioxide at dry standard conditions.

$$\left(\frac{7.6\,\text{lb - PM}}{10^6\ ft^3}\right)X\left(\frac{1\,\text{scf}}{1{,}000\,\text{Btu}}\right)X\left(\frac{10^6\ Btu}{1{,}024\,\text{dscf}}\right)X\left(\frac{12\,(\%\,CO_2)}{100}\right)X\left(\frac{7{,}000\,\text{gr}}{1\,\text{lb}}\right)=0.006\,\frac{grain}{dscf}$$

Where:

7.6 lb-PM/10^6 scf - Total PM emission factor for external combustion of natural gas (AP-42, Table 1.4-2, 7/1998)

1,000 Btu/scf - Heating value of Natural Gas from District Policy APR-1720 (12/20/2001)

1,024 dscf/10^6 Btu - Carbon Dioxide-Based F Factor, Dry Basis for Natural Gas @ 60 °F (40 CFR 60, Appendix A-7, Table 19-2; 1,040 dscf/10^6 Btu @ 68 °F)

100/12 - Correction Factor for 12% CO_2 in the combustion exhaust

7,000 gr/lb - Conversion Factor for lb to grain (AP-42, Appendix A, 9/1985 (reformatted 1/1995))

0.006 gr/dscf < 0.1 gr/dscf; therefore, natural gas-fired fuel burning equipment is expected to comply with the particulate matter concentration limit of this rule.

LPG-Fired Fuel Burning Equipment
The following calculations demonstrates that particulate matter emissions from fuel burning equipment fired on LPG (propane and/or butane) will not exceed the rule limit of 0.1 grain per cubic foot of gas calculated to 12% of carbon dioxide at dry standard conditions.

Propane

$$\left(\frac{0.7\,\text{lb - PM}}{10^3\ gal}\right)X\left(\frac{10^3\ gal}{91.5\,\text{x}\,10^6\ Btu}\right)X\left(\frac{10^6\ Btu}{1{,}172\,\text{dscf}}\right)X\left(\frac{12\,(\%\,CO_2)}{100}\right)X\left(\frac{7{,}000\,\text{gr}}{1\,\text{lb}}\right)=0.005\,\frac{grain}{dscf}$$

Butane

$$\left(\frac{0.8\text{ lb - PM}}{10^3\ gal}\right)X\left(\frac{10^3\ gal}{102\text{ x }10^6\ Btu}\right)X\left(\frac{10^6\ Btu}{1{,}231\text{ dscf}}\right)X\left(\frac{12\,(\%\,CO_2)}{100}\right)X\left(\frac{7{,}000\text{ gr}}{1\text{ lb}}\right)=0.005\,\frac{grain}{dscf}$$

Where:

0.7 lb-PM/10^3 gal - Total PM emission factor for external combustion of propane (AP-42, Table 1.5-1, 7/2008)

0.8 lb-PM/10^3 gal - Total PM emission factor for external combustion of Butane (AP-42, Table 1.5-1, 7/2008)

91.5 x 10^6 Btu/10^3 gal - Heating value of Propane (AP-42, Chapter 1.5 – Liquefied Petroleum Gas Combustion, 7/2008)

102 x 10^6 Btu/10^3 gal - Heating value of Butane (AP-42, Chapter 1.5 – Liquefied Petroleum Gas Combustion, 7/2008)

1,172 dscf/10^6 Btu - Carbon Dioxide-Based F Factor, Dry Basis for Propane @ 60 °F (40 CFR 60, Appendix A-7, Table 19-2; 1,190 dscf/10^6 Btu @ 68 °F)

1,231 dscf/10^6 Btu - Carbon Dioxide-Based F Factor, Dry Basis for Butane @ 60 °F (40 CFR 60, Appendix A-7, Table 19-2; 1,250 dscf/10^6 Btu @ 68 °F)

100/12 - Correction Factor for 12% CO_2 in the combustion exhaust

7,000 gr/lb - Conversion Factor for lb to grain (AP-42, Appendix A, 9/1985 (reformatted 1/1995))

0.005 gr/dscf < 0.1 gr/dscf; therefore, LPG-fired fuel burning equipment is expected to comply with the particulate matter concentration limit of this rule.

Section 5.2 prohibits a person from building, erecting, installing, or expanding any non-mobile fuel burning equipment unit that discharges contaminants into the atmosphere in excess of any of the following rates:

5.2.1 200 pounds per hour of sulfur compounds, calculated as sulfur dioxide (SO_2);
5.2.2 140 pounds per hour of nitrogen oxides, calculated as nitrogen dioxide (NO_2);
5.2.3 Ten (10) pounds per hour of combustion contaminants as defined in Rule 1020 (Definitions) and derived from the fuel

The fuel burning equipment at this facility will comply with these emission limits by using PUC quality natural gas with LPG as backup fuel. Using conservative emission factors, the following tables demonstrate that fuel burning equipment of typical sizes fired on PUC quality natural gas and/or LPG will comply with the emission limits of this Rule.

Natural Gas-Fired Fuel Burning Equipment Units

Table 2: Maximum Heat Input Rating for Compliance with Rule 4301 for Natural Gas-Fired Fuel Burning Equipment

Pollutant	Rule 4301 Emissions Limit (lb/hr)	Emission Factor (lb/10^6 scf)	Heating Value* (Btu/scf)	Emission Factor* (lb/MMBtu)	Maximum Rating for Compliance with Emissions Limit (MMBtu/hr)
SO_X (as SO_2)	200	2.85*	1,000	0.00285	**70,175.4**
NO_X (as NO_2)	140	100**	1,000	0.1	**1,400.0**
Combustion Contaminants (Total PM)	10	7.6***	1,000	0.0076	**1,315.8**

* SO_X emission factor for combustion of natural gas from District Policy APR-1720 (12/20/2001) and based on a natural gas HHV of 1000 Btu/scf and a total sulfur content of 1.0 gr/100 scf, which is more conservative than the value given in AP-42 of 2,000 gr/10^6 scf.

** NO_X emission factor for uncontrolled combustion of natural gas in small boilers (< 100 MMBtu/hr) from AP-42, Table 1.4-1, 7/1998; This emission factor is conservative since all units at the facility are required to have equipment to reduce NO_X emissions.

*** Total PM emission factor for combustion of natural gas from AP-42, Table 1.4-1, 7/1998

As shown in the table above, natural gas-fired fuel burning equipment with a maximum heat input rating of 1,315.8 MMBtu/hr or less is expected to comply with the emission limits in this rule. There are no fuel burning equipment units at the facility with maximum fuel input ratings in excess of this limit; therefore, compliance is expected when the units are fired on natural gas.

LPG-Fired Fuel Burning Equipment Units

Table 3: Maximum Heat Input Rating for Compliance with Rule 4301 for Propane-Fired Fuel Burning Equipment					
Pollutant	Rule 4301 Emissions Limit (lb/hr)	Emission Factor ($lb/10^3$ gal)	Heating Value*** ($Btu/10^3$ gal)	Emission Factor (lb/MMBtu)	Maximum Rating for Compliance with Emissions Limit (MMBtu/hr)
SO_X (as SO_2)	200	1.5*	91.5×10^6	0.0164	**12,195.1**
NO_X (as NO_2)	140	13**	91.5×10^6	0.142	**985.9**
Combustion Contaminants (Total PM)	10	0.7**	91.5×10^6	0.00765	**1,307.2**

* SO_X emission factor for combustion of propane calculated by conservatively assuming a maximum sulfur content of 15 gr/100 scf for commercial LPG and using the following equation from AP-42, Table 1.5-1, 7/2008: lb-$SO_2/10^3$ gal propane = 0.10S, with S being the gas sulfur content in gr/100 ft^3
** NO_X emission factor for uncontrolled combustion of propane and total PM emission factor for combustion of propane from AP-42, Table 1.5-1, 7/2008
*** Propane Heating Value from AP-42, 1.5 - Liquid Petroleum Gas Combustion, 7/2008

Table 4: Maximum Heat Input Rating for Compliance with Rule 4301 for Butane-Fired Fuel Burning Equipment					
Pollutant	Rule 4301 Emissions Limit (lb/hr)	Emission Factor ($lb/10^3$ gal)	Heating Value*** ($Btu/10^3$ gal)	Emission Factor (lb/MMBtu)	Maximum Rating for Compliance with Emissions Limit (MMBtu/hr)
SO_X (as SO_2)	200	1.35*	102×10^6	0.0132	**15,151.5**
NO_X (as NO_2)	140	15**	102×10^6	0.147	**952.4**
Combustion Contaminants (Total PM)	10	0.8**	102×10^6	0.00784	**1,275.5**

* SO_X emission factor for combustion of butane calculated by conservatively assuming a maximum sulfur content of 15 gr/100 scf for commercial LPG and using the following equation from AP-42, Table 1.5-1, 7/2008: lb-$SO_2/10^3$ gal butane = 0.09S, with S being the gas sulfur content in gr/100 ft^3
** NO_X emission factor for uncontrolled combustion of butane and total PM emission factor for combustion of butane from AP-42, Table 1.5-1, 7/2008
*** Butane Heating Value from AP-42, 1.5 - Liquid Petroleum Gas Combustion, 7/2008

As shown in the tables above, LPG-fired fuel burning equipment with a maximum heat input rating of 952.4 MMBtu/hr or less is expected to comply with the emission limits in this rule. There are no fuel burning equipment units at the facility with maximum fuel input ratings in excess of this limit; therefore, compliance is expected when the units are fired on LPG.

Section 5.3 stipulates that nothing in the rule shall be construed as preventing the maintenance or preventing the alteration or modification

of an existing fuel burning equipment unit which will reduce its mass rate of air contaminant emissions.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Condition 7 of the requirements for this permit unit assures compliance with this rule.

b. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

   - Condition 4 of the requirements for this permit unit assures compliance with this rule.

c. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

   - Condition 4 of the requirements for this permit unit assures compliance with this rule.

d. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

   - Condition 4 of the requirements for this permit unit assures compliance with this rule.

16. District Rule 4305, Boilers, Steam Generators and Process Heaters – Phase 2

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_X) and carbon monoxide (CO) from boilers, steam generators, and process heaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour.

Since emissions the limits of District Rules 4306 and 4320 and all other requirements are equivalent or more stringent than the requirements of District Rule 4305, compliance with the requirements of District Rules 4306 and 4320 as shown in the following sections assures compliance with the requirements of District Rule 4305.

17. District Rule 4306, Boilers, Steam Generators and Process Heaters – Phase 3

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_X) and carbon monoxide (CO) from boilers, steam generators, and process heaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Conditions 9, 13-16, 20-21, 23-25, 27-28, and 40 of the requirements for this permit unit assure compliance with this rule.

b. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

   - Conditions 6, 9-12, 14-16, 18-20, 22, and 26 of the requirements for this permit unit assure compliance with this rule.

c. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

   - Conditions 6, 9-16, 18-21, and 25 of the requirements for this permit unit assure compliance with this rule.

d. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

- Conditions 6, 10-11, 13, 16-20, 22-24, 27, 29, 31, and 33 of the requirements for this permit unit assure compliance with this rule.

18. District Rule 4309 – Dryers, Dehydrators, and Ovens

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_X) and carbon monoxide (CO) from dryers, dehydrators, and ovens. This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 million British thermal units per hour (5.0 MMBtu/hr) or greater.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

- Conditions 10, 13-15, 17, 20-23, 25, 27-28, 30, and 42 of the requirements for this permit unit assure compliance with this rule.

b. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

- Conditions 8, 11-13, 15-16, 18-22, 24, and 30 of the requirements for this permit unit assure compliance with this rule.

19. District Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr

The purpose of this rule is to limit the emissions of oxides of nitrogen (NO_X), carbon monoxide (CO), oxides of sulfur (SO_X), and particulate matter 10 microns or less (PM_{10}) from boilers, steam generators, and process heaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour.

Section 5.1 states that operators of a unit(s) shall comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis:

Section 5.1.1 requires the unit comply with the emission limits specified in Sections 5.2 and 5.4; or

Section 5.1.2, Pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4; or

Section 5.1.3, Comply with the applicable Low-use Unit requirements of Section 5.5.

Per Section 5.1.1, the units are in compliance with the NO_X and CO limits of Section 5.2 and comply with the particulate matter control requirements of Section 5.4 by firing on natural gas with LPG as a backup fuel.

Section 5.4 states the particulate matter control requirements.
5.4.1 To limit particulate matter emissions, an operator shall comply with one of the following requirements:

5.4.1.1 On and after the applicable NO_X Compliance Deadline specified in Section 5.2 Table 1, operators shall fire units exclusively on PUC-quality natural gas, commercial propane, butane, or liquefied petroleum gas, or a combination of such gases;

5.4.1.2 On and after the applicable NO_X Compliance Deadline specified in Section 5.2 Table 1, operators shall limit fuel sulfur content to no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet; or

5.4.1.3 On and after the applicable NO_X Compliance Deadline specified in Section 5.2 Table 1, operators shall install and properly operate an emission control system that reduces SO_2 emissions by at least 95% by weight; or limit exhaust SO_2 to less than or equal to 9 ppmv corrected to 3.0% O2.

The facility will comply with the requirements of Section 5.4 by firing on PUC regulated natural gas with commercial LPG as a backup fuel.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Conditions 7-9, 13-16, 20-21, 23-26, 28-29, and 42 of the requirements for this permit unit assure compliance with this rule.

b. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

   - Conditions 4-6, 9-12, 14-16, 18-22, and 26 of the requirements for this permit unit assure compliance with this rule.

c. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

   - Conditions 4-6, 9-16, 18-21, and 25 of the requirements for this permit unit assure compliance with this rule.

d. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

   - Conditions 4-6, 10-11, 13, 16-20, 22-25, 27, 29, 31, and 33 of the requirements for this permit unit assure compliance with this rule.

20. District Rule 4351, Boilers, Steam Generators and Process Heaters – Phase 1

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_X) from boilers, steam generators, and process heaters to levels consistent with Reasonably Available Control Technology (RACT).

This rule applies to any boiler, steam generator or process heater, with a rated heat input greater than 5 million Btu per hour that is fired with gaseous and/or liquid fuels, and is included in a major NO_X source. This rule does not apply to any unit located west of Interstate Highway 5 located in Fresno County, Kern County, or Kings County.

Since emissions the limits of District Rules 4306 and 4320 and all other requirements are equivalent or more stringent than the requirements of District Rule 4351, compliance with the requirements of District Rules 4306 and 4320 as shown in the sections above assures compliance with the requirements of District Rule 4351.

21. District Rule 4601 – Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). This rule further specifies labeling requirements, coatings thinning recommendations, test methodology, and storage requirements.

a. *S-1203-0-1: Facility-Wide Requirements*

- Conditions 23-25 of the requirements of the facility-wide permit assure compliance with this rule.

22. District Rule 4701 - Internal Combustion Engines – Phase 1

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_X), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. Except as provided in Section 4.0, the provisions of this rule apply to any internal combustion engine, rated greater than 50 bhp that requires a Permit to Operate (PTO).

There is one natural gas/LPG-fired emergency standby IC engine permitted at the facility. Pursuant to Section 2.0 of District Rule 4701, the engine is subject to District Rule 4701–*Internal Combustion Engines–Phase 1*. In addition, the engine is also subject to District Rule 4702–*Internal Combustion Engines–Phase 2*.

Since the emissions limits of District Rule 4702 and all other requirements are equivalent or more stringent than District Rule 4701 requirements, compliance with 4702 rule requirements will satisfy requirements of District Rule 4701 and no further discussion is required.

23. District Rule 4702 - Internal Combustion Engines

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_X), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SO_X) from internal combustion engines. This rule applies to any internal combustion engine with a rated at 25 brake horsepower or greater.

District Rule 4702 as amended August 18, 2011 has been submitted to the EPA to replace District Rule 4702 as amended January 18, 2007, which is contained in the SIP. The August 18, 2011 amendments to Rule 4702 are more stringent that the version of Rule 4702 (1/18/07) currently in the SIP. The amendments to Rule 4702 include the following additional requirements and changes:

1) Addition of requirements prohibiting the sale of non-agricultural IC engines rated 25 bhp to 50 bhp unless the engines meet the applicable requirements of Code of Federal Regulation (CFR) 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines for the year in which the ownership of the engine changed.
2) Lowering the NO_X emission limit to 11 ppmv @ 15% O_2 for certain categories of full-time non-agricultural IC engines
3) Allowing of the alternative option for operators of non-agricultural IC engines to continue complying with the emission limits in the 1/18/07 version of Rule 4702 by paying annual emission reduction fees in lieu of complying with the lower NO_X emission limits in the 8/18/11 rule amendments. The annual emission reduction fees would be used to other projects that would result in equivalent reductions.
4) Addition of new categories for limited-use engines and lean burn engines used for gas compression; these engines would generally remain subject to the emission limits in that were in the 1/18/07 version of Rule 4702.
5) Addition of requirements to limit SO_X emissions by limiting the sulfur content of fuels permitted for use in non-agricultural IC engines
6) No changes to emission limits or compliance dates for agricultural IC engines and compression-ignited IC engines except for clarification the requirement that certified Tier 1 and Tier 2 engines must be replaced with a Tier 4 no later than 6/1/2018. This is clarifies the latest compliance date since certified compression-ignited engines were required to comply by 1/1/2015 or 12 years after the installation date; however, the compliance date is based on the engine that was in place on or before June 1, 2006.

The August 18, 2011 amendments to District Rule 4702 did not result in any changes to the requirements for emergency standby IC engines or low-use IC engines compared to the January 18, 2007 version of District Rule 4702 that is contained in the SIP.

Section 4.2.1 states that except for the requirements of Section 5.9 and Section 6.2.3, the requirements of this rule shall not apply to emergency standby IC engine or a low-use engine, and provided that it is operated

with a properly maintained and operated nonresettable elapsed operating time meter, or an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO.

Section 5.9.1 states that engines subject to Section 4.2 shall comply with the requirements specified in Section 5.9.2 through 5.9.5.

5.9.2 Properly operate and maintain each engine as recommended by the engine manufacturer or emission control supplier system.

5.9.3 Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control supplier.

5.9.4 Install and operate a nonresettable elapsed time meter, or an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA. The operator shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

Section 6.2.3 states that an operator claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request. The records shall include, but are not limited to, the following: total hours of operation, type of fuel used, the purpose for operating the engine, for emergency standby engines – all hours of non-emergency and emergency operation shall be reported, and other support documentation necessary to demonstrate claim to the exemption.

The facility operates one IC engine that is an emergency standby engine, as defined in Rule 4702. The following conditions will ensure that the engine meets the requirements of emergency standby engines as defined in the rule.

a. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

- Conditions 8-14 and 22 of the requirements for this permit unit assure compliance with this rule.

24. District Rule 4801 - Sulfur Compounds

District Rule 4801 has been submitted to the EPA to replace Tulare County Rule 407 which is contained in the SIP. District Rule 4801 is as stringent as Tulare County Rule 407, as shown on Table 5 below.

Table 5: Comparison of District Rule 4801 to Tulare County Rule 407

REQUIREMENTS	District Rule 4801	Tulare County Rule 407
A person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

This rule limits the emission of sulfur compounds to 0.2% by volume (2,000 ppmv) calculated as SO_2, on a dry basis averaged over 15 minutes. The units at this facility will demonstrate compliance with this emission limit by using PUC quality natural gas with LPG as backup fuel.

Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

Volume $SO_2 = \frac{n\,RT}{P}$

With:

N = moles SO_2
T (Standard Temperature) = 60°F = 520°R
P (Standard Pressure) = 14.7 psi
R (Universal Gas Constant) = $\frac{10.73\,\text{psi}\cdot\text{ft}^3}{\text{lb}\cdot\text{mol}\cdot{}^\circ\text{R}}$

Natural Gas Combustion:

$$\frac{0.00285\,lb-SOx}{MMBtu}\times\frac{MMBtu}{8{,}578\,dscf}\times\frac{1\,lb\cdot mol}{64\,lb-SOx}\times\frac{10.73\,psi\cdot ft^3}{lb\cdot mol\cdot{}^\circ R}\times\frac{520^\circ R}{14.7\,psi}\times\frac{1{,}000{,}000\cdot parts}{million}=1.97\,\frac{parts}{million}$$

Where:

0.00285 lb-SO_X/MMBtu - SO_X emission factor for combustion of PUC quality natural gas from District Policy APR-1720 (12/20/2001) (based on a natural gas HHV of 1000 Btu/scf and a total sulfur content

of 1.0 gr/100 scf; note: the sulfur content in the District policy is more conservative than the value given in AP-42 of 2,000 gr/10^6 scf (0.2 gr/100 scf))

8,578 dscf/10^6 Btu - dry F Factor for natural gas @ 60 °F (40 CFR 60, Appendix A-7, Table 19-2; 8,710 dscf/10^6 Btu @ 68 °F)

64 lb-SO_X/lb-mol - molecular mass of SO_X as SO_2

1.97 ppmv < 2,000 ppmv (0.2%); therefore, natural gas-fired units are expected to comply with the emission limit of this rule.

LPG Combustion:

$$\frac{0.0164\,lb-SOx}{MMBtu}\times\frac{MMBtu}{8{,}578\,dscf}\times\frac{1\,lb\cdot mol}{64\,lb}\times\frac{10.73\,psi\cdot ft^3}{lb\cdot mol\cdot{}^\circ R}\times\frac{520^\circ R}{14.7\,psi}\times\frac{1{,}000{,}000\cdot parts}{million}=11\frac{parts}{million}$$

Where:

0.0164 lb-SO_X/MMBtu - SO_X emission factor for combustion of commercial LPG (conservatively based on a maximum sulfur content of 15 gr/100 scf for commercial LPG a SO_X emission factor of 0.10S lb-SO_X/10^3 gal propane, with S being the gas sulfur content in gr/100 ft^3 (AP-42, Chapter 1.5), and a heating value for propane of 91.5 x 10^6 Btu/10^3 gal (AP-42, Chapter 1.5))

8,578 dscf/10^6 Btu - dry F Factor for propane and butane @ 60 °F (40 CFR 60, Appendix A-7, Table 19-2; 8,710 dscf/10^6 Btu @ 68 °F)

64 lb-SO_X/lb-mol - molecular mass of SO_X as SO_2

11 ppmv < 2,000 ppmv (0.2%); therefore, LPG-fired units are expected to comply with the emission limit of this rule.

As shown above, the natural gas/LPG-fired units at this facility are expected to comply with the requirements of District Rule 4801.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Condition 7 of the requirements for this permit unit assures compliance with this rule.

b. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

   - Condition 2 of the requirements for this permit unit assures compliance with this rule.

c. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

   - Condition 6 of the requirements for this permit unit assures compliance with this rule.

d. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

   - Condition 7 of the requirements for this permit unit assures compliance with this rule.

e. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

   - Condition 6 of the requirements for this permit unit assures compliance with this rule.

f. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

- Condition 6 of the requirements for this permit unit assures compliance with this rule.

25. District Rule 8011 - General Requirements

The purpose of Regulation VIII (Fugitive PM_{10} Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM_{10}) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The Rules contained in this Regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM_{10} Nonattainment Areas. The rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM_{10} and particles larger than PM_{10}. Controlling fugitive dust missions when visible emissions are detected will not prevent all PM_{10} emissions, but will substantially reduce PM_{10} emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in this rule are applicable to all Rules under Regulation VIII (Fugitive PM_{10} Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

a. *S-1203-0-1: Facility-Wide Requirements*

- Conditions 29-34 of the requirements of the facility-wide permit assure compliance with this rule.

26. District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities.

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule also applies to the construction of new landfill

disposal sites or modification to existing landfill disposal sites prior to commencement of landfilling activities.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit Visible Dust Emissions (VDE) to 20% opacity or less. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 29 of the requirements of the facility-wide permit assures compliance with this rule.

27. District Rule 8031 - Bulk Materials

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials. This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit Visible Dust Emissions (VDE) to 20% opacity or less or to comply with the conditions for a stabilized surface as defined in Rule 8011. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 30 of the requirements of the facility-wide permit assures compliance with this rule.

28. District Rule 8041 - Carryout and Trackout

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout. This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that the owner or operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. In

addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from paved public roads does not exempt an owner or operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 31 of the requirements of the facility-wide permit assures compliance with this rule.

29. District Rule 8051 - Open Areas

The purpose of this rule is to limit fugitive dust emissions from open areas. This rule applies to any open area having 3.0 acres or more of disturbed surface area that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

Section 5.0 requires that whenever open areas are disturbed or vehicles are used in open areas, the owner or operator shall implement one or more of the control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit Visible Dust Emissions (VDE) to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 32 of the requirements of the facility-wide permit assures compliance with this rule.

30. District Rule 8061 - Paved and Unpaved Roads

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria. This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 33 of the requirements of the facility-wide permit assures compliance with this rule.

31. District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria. This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 34 of the requirements of the facility-wide permit assures compliance with this rule.

32. 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR 60 Subpart Dc applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 million British thermal units per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr.

40 CRR 60, Subpart Dc contains SO_2 and Particulate Matter (PM) emissions limits and opacity standards for affected units that combust coal, coal refuse, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels.

The affected units at this facility only combust PUC quality natural gas with LPG as backup fuel; therefore, these provisions of Subpart Dc do not apply to the units at the facility.

Pursuant to Section 60.41c - Definitions, for purposes of Subpart Dc Natural gas means:

(1) A naturally occurring mixture of hydrocarbon and non-hydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or
(2) Liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see § 60.17); or
(3) A mixture of hydrocarbons that maintains a gaseous state at ISO conditions. Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 34 and 43 megajoules (MJ) per dry standard cubic meter (910 and 1,150 Btu per dry standard

As stated above, the affected units at this facility are limited to combusting PUC quality natural gas with LPG as backup fuel; therefore, for purposes of this subpart, the units are fired only on natural gas.

The following requirements of Section 60.48c - Reporting and Recordkeeping Requirements are applicable to affected units that combust natural gas or LPG-fired:

(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(g)(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in § 60.48c(f) to demonstrate compliance with the SO_2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(g)(3) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in § 60.42C to use fuel certification to demonstrate compliance with the SO_2 standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

The affected units at this facility only combust PUC quality natural gas with LPG as backup fuel, which is also treated as natural gas for purposes of the subpart; therefore, records of the amount of fuel combusted may be kept for each calendar month rather than for each operating day.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   - Conditions 41-42 of the requirements for this permit unit assure compliance with this rule.

b. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

   - Conditions 25-26 of the requirements for this permit unit assure compliance with this rule.

c. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

   - Conditions 24-25 of the requirements for this permit unit assure compliance with this rule.

d. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

   - Conditions 30 and 33 of the requirements for this permit unit assure compliance with this rule.

33. 40 CFR 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The purpose of 40 CFR 60 Subpart JJJJ is to establish New Source Performance Standards (NSPS) to reduce emissions of NO_X, SO_X, PM, CO, and VOC from new stationary spark ignition (SI) internal combustion (IC) engines.

Pursuant to Section 60.4230(a), these standards apply to the following engines. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

1) Manufacturers of stationary SI ICE with a maximum engine power less than or equal to 19 kilowatt (KW) (25 horsepower (HP)) that are manufactured on or after July 1, 2008.
2) Manufacturers of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) that are gasoline fueled or that are rich burn engines fueled by liquefied petroleum gas (LPG), where the date of manufacture is:
   (i) On or after July 1, 2008; or
   (ii) On or after January 1, 2009, for emergency engines.
3) Manufacturers of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) that are not gasoline fueled and are not rich burn engines fueled by LPG, where the manufacturer participates in the voluntary manufacturer certification program described in this subpart and where the date of manufacture is:
   (i) On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 HP (except lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP);
   (ii) On or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP;
   (iii) On or after July 1, 2008, for engines with a maximum engine power less than 500 HP; or
   (iv) On or after January 1, 2009, for emergency engines.
4) Owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:
   (i) On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 HP (except lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP);
   (ii) on or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP;
   (iii) on or after July 1, 2008, for engines with a maximum engine power less than 500 HP; or
   (iv) on or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 KW (25 HP).
5) Owners and operators of stationary SI ICE that are modified or reconstructed after June 12, 2006, and any person that modifies or reconstructs any stationary SI ICE after June 12, 2006.

6) The provisions of § 60.4236 of this subpart are applicable to all owners and operators of stationary SI ICE that commence construction after June 12, 2006.

The stationary SI IC engine at this facility is an existing unit that has been at the facility since 2002. The engine has not been modified or reconstructed. Therefore, 40 CFR 60 Subpart JJJJ does not apply to the stationary IC engine at this facility.

34. 40 CFR Parts 61.145 and 61.150 (40 CFR 61 Subpart M) - National Emissions Standards for Asbestos (District Rule 4002)

These are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures.

a. *S-1203-0-1: Facility-Wide Requirements*

- Condition 35 of the requirements of the facility-wide permit assures compliance with this rule.

35. 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

§ 63.6580 Purpose

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§ 63.6585 Am I subject to this subpart?

This subpart applies to owners and operators of stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

§ 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) *Affected source.* An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

This facility is an area source of HAP emissions; therefore, this subpart applies.

(1) Existing stationary RICE

...

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if construction or reconstruction of the stationary RICE commenced before June 12, 2006.

The stationary emergency IC engine at this facility (permit unit S-1203-17) is defined as an "existing" RICE since installation was prior to June 12, 2006.

(2) New stationary RICE

...

(iii) A stationary RICE located at an area source of HAP emissions is new if construction of the stationary RICE commenced on or after June 12, 2006.

As stated above the emergency stationary IC engine at this facility is defined as "existing" since installation was prior to June 12, 2006.

...

(3) The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

(i) Existing spark ignition 2 stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;
(ii) Existing spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;
(iii) Existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;
(iv) Existing limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;
(v) Existing stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;

The existing engine at this facility does not qualify for any of the exemptions listed above.

(c) *Stationary RICE subject to Regulations under 40 CFR Part 60.* An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

(1) A new or reconstructed stationary RICE located at an area source;
(2) A new or reconstructed 2SLB stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
(3) A new or reconstructed 4SLB stationary RICE with a site rating of less than 250 brake HP located at a major source of HAP emissions;
(4) A new or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
(5) A new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;
(6) A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
(7) A new or reconstructed compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

As stated the stationary IC engine at this facility is defined as "existing"; therefore this section does not apply.

§ 63.6595 When do I have to comply with this subpart?

(a) *Affected sources.* (1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations, operating limitations and other requirements no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with

the applicable emission limitations, operating limitations, and other requirements no later than May 3, 2013. If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013.

The stationary IC engine at this facility is an existing SI RICE located at an area source of HAP emissions; therefore, the full compliance date for this subpart for the engine at the facility is October 19, 2013.

§ 63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d (*Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions*) to this subpart and the operating limitations in Table 1b (*Operating Limitations for Existing, New, and Reconstructed SI 4SRB Stationary RICE >500 HP Located at a Major Source of HAP Emissions*) and Table 2b (*Operating Limitations for New and Reconstructed 2SLB and CI Stationary RICE >500 HP Located at a Major Source of HAP Emissions, New and Reconstructed 4SLB Stationary RICE ≥250 HP Located at a Major Source of HAP Emissions, Existing CI Stationary RICE >500 HP*) to this subpart that apply to you.

Table 2d to Subpart ZZZZ of Part 63 - Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

The following table applies to the existing emergency stationary Spark Ignition RICE:

Table 6: Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions		
For each . . .	**You must meet the following requirement, except during periods of startup . . .**	**During periods of startup you must . . .**
5. Emergency stationary SI RICE; black start stationary SI RICE; non-emergency, non-black start 4SLB stationary RICE >500 HP that operate 24 hours or less per calendar year; non-emergency, non-black start 4SRB stationary RICE >500 HP that operate 24 hours or less per calendar year.[2]	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[1] b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

[1] Sources have the option to utilize an oil analysis program as described in § 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.
[2] If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

§ 63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?

The only internal combustion engine at the facility is spark-ignited; therefore, this section does not apply.

§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

. . .

(d) If you are operating a new or reconstructed emergency 4SLB stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions, you must install a non-resettable hour meter prior to the startup of the engine.

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control

device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:
(1) An existing stationary RICE with a site rating of less than 100 HP located at a major source of HAP emissions;
(2) An existing emergency or black start stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions;
(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions;
(4) An existing non-emergency, non-black start stationary CI RICE with a site rating less than or equal to 300 HP located at an area source of HAP emissions;
(5) An existing non-emergency, non-black start 2SLB stationary RICE located at an area source of HAP emissions;
(6) An existing non-emergency, non-black start stationary RICE located at an area source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis.
(7) An existing non-emergency, non-black start 4SLB stationary RICE with a site rating less than or equal to 500 HP located at an area source of HAP emissions;
(8) An existing non-emergency, non-black start 4SRB stationary RICE with a site rating less than or equal to 500 HP located at an area source of HAP emissions;
(9) An existing, non-emergency, non-black start 4SLB stationary RICE with a site rating greater than 500 HP located at an area source of HAP emissions that is operated 24 hours or less per calendar year; and
(10) An existing, non-emergency, non-black start 4SRB stationary RICE with a site rating greater than 500 HP located at an area source of HAP emissions that is operated 24 hours or less per calendar year.

(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

(g) If you own or operate an existing non-emergency, non-black start CI engine greater than or equal to 300 HP that is not equipped with a closed crankcase ventilation system, you must comply with either paragraph (g)(1) or paragraph (2) of this section. Owners and operators must follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and

replacing the crankcase filters, or can request the Administrator to approve different maintenance requirements that are as protective as manufacturer requirements. Existing CI engines located at area sources in areas of Alaska that meet either § 63.6603(b)(1) or § 63.6603(b)(2) do not have to meet the requirements of this paragraph (g). Existing CI engines located on offshore vessels that meet § 63.6603(c) do not have to meet the requirements of this paragraph (g).

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

§ 63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?

(a) You must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

(b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in § 63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

(c) The annual compliance demonstration required for existing non-emergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that are operated more than 24 hours per calendar year must be conducted according to the specific requirements in this section.

...

(d) For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations.

Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR 94.11(a).

(e) You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.

(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.
(1) There is no time limit on the use of emergency stationary RICE in emergency situations.
(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the

engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.
(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
(D) The power is provided only to the facility itself or to support the local transmission and distribution system.
(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

Applicable Requirements from Table 6 to Subpart ZZZZ of Part 63 - Continuous Compliance With Emission Limitations, Operating Limitations, Work Practices, and Management Practices

Table 7: Continuous Compliance with Emission Limitations, Operating Limitations, Work Practices, and Management Practices for Stationary RICE		
For each . . .	**You must meet the following requirement, except during periods of startup . . .**	**During periods of startup you must . . .**
9. Existing emergency and black start stationary RICE ≤500 HP located at a major source of HAP, existing non-emergency stationary RICE <100 HP located at a major source of HAP, existing emergency and black start stationary RICE located at an area source of HAP, existing non-emergency stationary CI RICE ≤300 HP located at an area source of HAP, existing non-emergency 2SLB stationary RICE located at an area source of HAP, existing non-emergency stationary SI RICE located at an area source of HAP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, existing non-emergency 4SLB and 4SRB stationary RICE ≤500 HP located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that operate 24 hours or less per calendar year, and existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that are remote stationary RICE	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

§ 63.6635 How do I monitor and collect data to demonstrate continuous compliance?

(a) If you must comply with emission and operating limitations, you must monitor and collect data according to this section.

(b) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, you must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. You must, however, use all the valid data collected during all other periods.

§ 63.6645 What notifications must I submit and when?

(a) You must submit all of the notifications in §§ 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following:
(1) An existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.
(2) An existing stationary RICE located at an area source of HAP emissions.
...
(5) This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.
...
(g) If you are required to conduct a performance test, you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1).

(h) If you are required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to this subpart, you must submit a Notification of Compliance Status according to §63.9(h)(2)(ii).
(1) For each initial compliance demonstration required in Table 5 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration.
(2) For each initial compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, you must submit the Notification of Compliance Status, including the performance test results, before the

close of business on the 60th day following the completion of the performance test according to §63.10(d)(2).

(i) If you own or operate an existing non-emergency CI RICE with a site rating of more than 300 HP located at an area source of HAP emissions that is certified to the Tier 1 or Tier 2 emission standards in Table 1 of 40 CFR 89.112 and subject to an enforceable state or local standard requiring engine replacement and you intend to meet management practices rather than emission limits, as specified in § 63.6603(d), you must submit a notification by March 3, 2013, stating that you intend to use the provision in § 63.6603(d) and identifying the state or local regulation that the engine is subject to.

§ 63.6650 What reports must I submit and when?

(a) You must submit each report in Table 7 of this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of this section.

...

(5) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section.

(c) The Compliance report must contain the information in paragraphs (c)(1) through (6) of this section.
(1) Company name and address.
(2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
(3) Date of report and beginning and ending dates of the reporting period.
(4) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.6605(b), including actions taken to correct a malfunction.

(5) If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period.
(6) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in § 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.

(d) For each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in paragraphs (c)(1) through (4) of this section and the information in paragraphs (d)(1) and (2) of this section.
(1) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
...
(f) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.
...

§ 63.6655 What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records as follows:
(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).
(2) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).
(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.
(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
....

(d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE:
(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.
(2) An existing stationary emergency RICE.
(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in § 63.6640(f)(2)(ii) or (iii) or § 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.
(1) An existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines.
(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

§ 63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to § 63.10(b)(1).

(b) As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1).

Conditions requiring compliance with this regulation will be included in the permit as follows:

a. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

- Conditions 8-10 and 14-22 of the requirements for this permit unit assure compliance with this rule.

36. 40 CFR Parts 64, Compliance Assurance Monitoring (CAM)

§64.2 – Applicability

This section requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:
1) the unit must have an emission limit for the pollutant;
2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
3) the unit must have a pre-control potential to emit of greater than the major source thresholds

§64.3 - Monitoring Design Criteria

This section specifies the design criteria for the CAM system. Paragraph (a) (*General criteria*) requires that the CAM system be designed to obtain data for one or more appropriate indicators of emission control system performance and requires the owner to establish appropriate ranges or designated conditions for the selected indicators such that operation

within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions.

Paragraph (b) (*Performance criteria)* requires the owner or operator to establish and maintain the following:

- Specifications to ensure that representative data are collected
- Verification procedures for startup of new monitoring equipment
- Quality assurance and control practices to ensure continuing validity of data
- Data collection frequency and procedures

Paragraph (c) (*Evaluation factors)* requires the owner or operator to take into account site specific factors in the design of the CAM system.

Paragraph (d) (*Special criteria for the use of continuous emission, opacity, or predictive monitoring systems)* requires the owner or operator to use a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS), or a predictive emission monitoring system (PEMS) to satisfy CAM requirements, provided that these monitoring systems are required pursuant to other authority under the Clean Air Act or state or local law.

This subsection also stipulates that the use of a CEMS, COMS, or PEMS that satisfies any of the following monitoring requirements shall be deemed to satisfy the general design criteria in paragraphs (a) and (b) of this section, provided that a COMS may be subject to the criteria for establishing indicator ranges under paragraph (a) of this section:

(i) Section 51.214 and appendix P of 40 CFR 51;
(ii) Section 60.13 and appendix B of 40 CFR 60;
(iii) Section 63.8 and any applicable performance specifications required pursuant to the applicable subpart of 40 CFR 63; (iv) 40 CFR 75;
(v) Subpart H and appendix IX of 40 CFR 266; or
(vi) In the event that the monitoring system is not subject to any of the requirements listed above, comparable requirements and specifications established by the permitting authority.

The owner or operator shall design the monitoring system subject to this paragraph (d) to:

(i) Allow for reporting of exceedances (or excursions if applicable to a COMS used to assure compliance with a particulate matter standard), consistent with any period for reporting of

exceedances in an underlying requirement. If an underlying requirement does not contain a provision for establishing an averaging period for the reporting of exceedances or excursions, the criteria used to develop an averaging period specified in the data collection procedures required under paragraph (b) of this section shall apply; and

(ii) Provide an indicator range consistent with paragraph (a) of this section for a COMS used to assure compliance with a particulate matter standard. If an opacity standard applies to the pollutant-specific emissions unit, such limit may be used as the appropriate indicator range unless the opacity limit fails to meet the criteria in paragraph (a) of this section after considering the type of control device and other site-specific factors applicable to the pollutant-specific emissions unit.

§64.4 - Submittal Requirements

This section specifies submittal requirements for the owner or operator which ensure the CAM system will comply with the design criteria of §64.3.

§64.5 - Deadlines for Submittals

This section specifies required timing for submittals required under §64.4.

For all large pollutant-specific emissions units with the potential to emit (taking into account control devices) the applicable regulated air pollutant in an amount equal to or greater than 100 percent of the amount required for a source to be classified as a major source, the owner or operator shall submit the information required at the following times. On or after April 20, 1998, the owner or operator shall submit information as part of an application for an initial Title V permit if, by that date, the application has either not been filed or has not been deemed complete. Where the initial Title V permit has been issued without implementation of 40 CFR 64, the owner or operator must make the required submittals as a part of a subsequent application for any significant permit revision. If the required information is not submitted by either of these deadlines, it must be submitted as a part of the application for the Title V permit renewal.

For other pollutant-specific emissions units, the required submittal deadline is the application for Title V permit renewal.

§64.6 - Approval of monitoring

This section stipulates the following:

- A requirement that the permitting authority act to approve the proposed monitoring by confirming that the monitoring submitted complies with the requirements of §64.3
- An allowance for the permitting authority to condition the approval based on collecting additional data on the indicators to be monitored, including performance or compliance testing
- The minimum conditions that must be placed on the permit in the event that the proposed monitoring is approved by the permitting authority including a milestone schedule for completion of any conditional approval actions required by the owner or operator, such as installations, testing, or verification of operational status
- Actions required by the permitting authority in the event that the proposed monitoring is not approved

The CAM submittal requirements and stipulations for approval of such submittals pursuant to §64.4, §64.5, and §64.6 have been completed in conjunction with the application and review process for this renewal of the Title V permit.

§64.7 - Operation of Approved Monitoring

This section stipulates the following:

- Requirements that the owner or operator 1) commence the monitoring upon receipt of a Title V permit that includes such monitoring, 2) properly maintain the monitoring system, and 3) conduct all monitoring in a continuous mode with the exception of outage periods associated with monitor malfunction and repair and with quality assurance and control activities
- Actions required by the owner or operator in response to excursions or exceedances
- A requirement for the owner or operator to document any need for improved monitoring based upon either an identification of a failure of the monitoring system to identify an excursion or exceedance or upon the results of compliance or performance testing that identifies a need to modify the monitoring

§64.8 - Quality Improvement Plan (QIP) Requirements

This section stipulates that the Administrator or the permitting authority may require that the facility develop and implement a QIP in the event of a

determination of a need for improved monitoring pursuant to §64.7. §64.8 also identifies the minimum elements required in the QIP, and requires that the facility implement the QIP as expeditiously as possible, with implementation not exceeding 180 days after the date that the need for implementation was identified unless the permitting authority is notified.

§64.9 - Reporting and Recordkeeping Requirements

This section stipulates the minimum reporting and recordkeeping requirements for facilities subject to 40 CFR 64.

§64.10 - Savings Provisions

This section states that the purpose of 40 CFR 64 is to require, as a part of the issuance of a Title V permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of 40 CFR 64. In addition, §64.10 states that nothing in 40 CFR 64 shall excuse an owner or operator from any other requirements of federal, state or local law or restrict or abrogate the authority of the Administrator or of the permitting authority.

a. *S-1203-8-8: Niro Inc. Multi-Stage Type MSD 500 Spray Dryer with 15.0 MMBtu/hr Natural Gas/LPG Direct-Fired Maxon Ultra Low NO_X Crossfire Line Burner and 15.4 MMBtu/hr Natural Gas/LPG Indirect-Fired TODD Rapid Mix Ultra Low NO_X Burner and FGR, Feed System Indirect Hot Air System, Drying Chamber, Exhaust Air System with Fluidizer Assembly, Cyclone and Baghouse Filter*

   This dryer is equipped with a direct-fired low NO_X burner, an indirect-fired low NO_X burner with flue gas recirculation (FGR), and a cyclone and baghouse filter. The unit is not equipped with any add-on controls for NO_X from the direct-fired burner or SO_X, CO, or VOC that would cause the unit to be subject to CAM requirements. Therefore, CAM is not required for NO_X from the direct-fired burner or SO_X, CO, or VOC.

   The unit may be subject to CAM for NO_X from the indirect-fired burner since it is equipped with an FGR system, which is an add-on control for NO_X. The unit also may be subject to CAM for PM_{10} since it is equipped with a cyclone and baghouse filter, which is an add-on control for PM_{10}. The following calculations will show if the potential to emit will be greater than the major source thresholds for NO_X.

   <u>NO_X</u>
   Major source threshold for NO_X: 20,000 lb-NO_X/year

Controlled emission factor for indirect-fired burner with FGR: 0.011 lb-NO_X/MMBtu (9 ppmvd NO_X @ 3% O_2) (permit condition)

Pre-control emission factor: 0.05 lb-NO_X/MMBtu (based on AP-42, Table 1.4-1, 7/1998 NO_X emission factor for combustion of natural gas in small boilers (< 100 MMBtu/hr) with low-NO_X burners)

Maximum Annual Hours of Operation: 8,760 hr/yr

Controlled Annual Potential to Emit: = 15.4 MMBtu/hr x 0.011 lb-NO_X/MMBtu x 8,760 hr/yr = 96 lb-NO_X/year

Pre-control Annual Potential to Emit = 15.4 MMBtu/hr x 0.05 lb-NO_X/MMBtu x 8,760 hr/yr = 6,745 lb-NO_X/year

6,745 lb-NO_X/year < 20,000 lb-NO_X/year

As shown above, CAM is not required for NO_X emissions from this unit since the pre-control potential to emit is less than the major source threshold for NO_X.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor from the baghouse: 0.344 lb-PM_{10}/ton (permit condition)

Baghouse control efficiency: 99%

Maximum Daily Process Rate: 50 ton/day (permit condition)

Controlled Annual Potential to Emit = 0.344 lb-PM_{10}/ton x 50 ton/day x 365 day/yr = 6,278 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 6,278 lb-PM_{10}/year ÷ (1 – 0.99) = 627,800 lb-PM_{10}/year

627,800 lb-PM_{10}/year ≥ 140,000 lb-PM_{10}/year

As shown above, CAM is required for PM_{10} emissions from this unit since the pre-control potential to emit is equal to or greater than the major source threshold for PM_{10}. However, because the controlled PM_{10} emissions from the unit are less than the Major Source Threshold, the unit is not a large pollutant-specific emissions unit as defined in 40 CFR §64.5. Pursuant to 40 CFR §64.5(b), deadlines for submittal for other pollutant-specific emission units, a CAM plan is not

required until the time of the first renewal of the Title V permit; therefore, compliance with CAM will not be addressed in this initial Title V permit.

b. *S-1203-9-6: 22.4 MMBtu/hr Niro Inc. Tall Form Direct Heat Spray Dryer Model 1600 Consisting of Feed System, Drying Chamber, Holding Belt, and Wet Scrubber*

This dryer is equipped with a direct-fired low NO_X burner and a wet-scrubber for control of particulate matter. The unit is not equipped with any add-on controls for NO_X, SO_X, CO, or VOC that would cause the unit to be subject to CAM requirements. Therefore, CAM is not required for NO_X, SO_X, CO, or VOC. The unit may be subject to CAM for PM_{10} since it is equipped with a wet scrubber for control of PM_{10}. The following calculations will show if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor after the scrubber: 0.56 lb-PM_{10}/ton (permit condition)

Scrubber control efficiency: 85% (Per AP-42 Appendix B.2 (9/1990, reformatted 1/1995), Table B.2-3 – Typical Collection Efficiencies of Various Particulate Control Devices, the control efficiency for low efficiency wet-scrubbers is 80-90% for particles 2.5 -10 μm in size)

Maximum Daily Process Rate: 242 ton/day (permit condition)

Controlled Annual Potential to Emit = 0.56 lb-PM_{10}/ton x 242 ton/day x 365 day/yr = 49,465 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 49,465 lb-PM_{10}/year ÷ (1 – 0.85) = 329,767 lb-PM_{10}/year

329,767 lb-PM_{10}/year ≥ 140,000 lb-PM_{10}/year

As shown above, CAM is required for PM_{10} emissions from this unit since the pre-control potential to emit is equal to or greater than the major source threshold for PM_{10}. However, because the controlled PM_{10} emissions from the unit are less than the Major Source Threshold, the unit is not a large pollutant-specific emissions unit as defined in 40 CFR §64.5. Pursuant to 40 CFR §64.5(b), deadlines for submittal for other pollutant-specific emission units, a CAM plan is not required until the time of the first renewal of the Title V permit;

therefore, compliance with CAM will not be addressed in this initial Title V permit.

c. *S-1203-10-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "A" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

This storage silo is equipped with a bin vent filter for control of particulate matter. The unit may be subject to CAM for PM_{10}. The following calculations will determine if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor: 0.015 lb-PM_{10}/ton (permit condition)

Bin Vent control efficiency: 99%

Maximum Daily Process Rate: 220 ton/day (permit condition)

Controlled Annual Potential to Emit = 0.015 lb-PM_{10}/ton x 220 ton/day x 365 day/yr = 1,205 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 1,205 lb-PM_{10}/year ÷ (1 – 0.99) = 120,500 lb-PM_{10}/year

120,500 lb-PM_{10}/year < 140,000 lb-PM_{10}/year

As shown above, CAM is not required for PM_{10} emissions from this unit since the pre-control potential to emit is less than the major source threshold for PM_{10}.

d. *S-1203-11-2: 37,375 Gallon (5,000 Cu. Ft.) Whey Powder Storage Silo "B" with Bin Vent, 3 hp Power Silo Bin Discharger, and 2 hp Exhaust Fan*

This storage silo is equipped with a bin vent filter for control of particulate matter. Therefore, the unit may be subject to CAM for PM_{10}. The following calculations will determine if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor: 0.015 lb-PM_{10}/ton (permit condition)

Bin Vent control efficiency: 99%

Maximum Daily Process Rate: 220 ton/day (permit condition)

Controlled Annual Potential to Emit = 0.015 lb-PM_{10}/ton x 220 ton/day x 365 day/yr = 1,205 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 1,205 lb-PM_{10}/year ÷ (1 – 0.99) = 120,500 lb-PM_{10}/year

120,500 lb-PM_{10}/year < 140,000 lb-PM_{10}/year

As shown above, CAM is not required for PM_{10} emissions from this unit since the pre-control potential to emit is less than the major source threshold for PM_{10}.

e. *S-1203-12-2: 26,162 Gallon (3,500 Cu. Ft.) Whey Powder Storage Silo "C" with Bin Vent, 3 hp Power Silo Bin Discharger, 2 hp Exhaust Fan, and 1 hp Convey-Thru Rotary Airlock*

This storage silo is equipped with a bin vent filter for control of particulate matter. Therefore, the unit may be subject to CAM for PM_{10}. The following calculations will determine if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor: 0.015 lb-PM_{10}/ton (permit condition)

Bin Vent control efficiency: 99%

Maximum Daily Process Rate: 55 ton/day (permit condition)

Controlled Annual Potential to Emit = 0.015 lb-PM_{10}/ton x 55 ton/day x 365 day/yr = 301 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 301 lb-PM_{10}/year ÷ (1 – 0.99) = 30,100 lb-PM_{10}/year

30,100 lb-PM_{10}/year < 140,000 lb-PM_{10}/year

As shown above, CAM is not required for PM_{10} emissions from this unit since the pre-control potential to emit is less than the major source threshold for PM_{10}.

f. *S-1203-13-1: Avapac Bulk Bag Filling System including Model C-63-00 Bulk Bag Filling Machine, 350 Cubic Foot Surge Hopper with Nucon Bin Vent Served by a Model NCRD 102-100-3T Dust Collector Shared with S-1203-14 and S-1203-15*

This unit utilizes a dust collector for control of particulate matter. Therefore, the unit may be subject to CAM for PM_{10}. The following calculations will determine if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor: 0.004 lb-PM_{10}/ton (permit condition)

Bin Vent control efficiency: 99%

Maximum Daily Process Rate: 280 ton/day (permit condition)

Controlled Annual Potential to Emit = 0.004 lb-PM_{10}/ton x 280 ton/day x 365 day/yr = 409 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 409 lb-PM_{10}/year ÷ (1 – 0.99) = 40,900 lb-PM_{10}/year

40,900 lb-PM_{10}/year < 140,000 lb-PM_{10}/year

As shown above, CAM is not required for PM_{10} emissions from this unit since the pre-control potential to emit is less than the major source threshold for PM_{10}.

g. *S-1203-14-1: Avapac Carousel Bag Filling System Served by Dust Collector System listed on Permit S-1203-13*

This unit utilizes a dust collector for control of particulate matter. Therefore, the unit may be subject to CAM for PM_{10}. The following calculations will determine if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor: 0.004 lb-PM_{10}/ton (permit condition)

Bin Vent control efficiency: 99%

Maximum Daily Process Rate: 280 ton/day (permit condition)

Controlled Annual Potential to Emit = 0.004 lb-PM_{10}/ton x 280 ton/day x 365 day/yr = 409 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 409 lb-PM_{10}/year ÷ (1 – 0.99) = 40,900 lb-PM_{10}/year

40,900 lb-PM_{10}/year < 140,000 lb-PM_{10}/year

As shown above, CAM is not required for PM_{10} emissions from this unit since the pre-control potential to emit is less than the major source threshold for PM_{10}.

h. *S-1203-15-1: Avapac Inline Bag Filling System including 350 Cubic Foot Powder Surge Hopper Served by Dust Collector System listed on Permit S-1203-13*

This unit utilizes a dust collector for control of particulate matter. Therefore, the unit may be subject to CAM for PM_{10}. The following calculations will determine if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor: 0.004 lb-PM_{10}/ton (permit condition)

Bin Vent control efficiency: 99%

Maximum Daily Process Rate: 280 ton/day (permit condition)

Controlled Annual Potential to Emit = 0.004 lb-PM_{10}/ton x 280 ton/day x 365 day/yr = 409 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 409 lb-PM_{10}/year ÷ (1 – 0.99) = 40,900 lb-PM_{10}/year

40,900 lb-PM_{10}/year < 140,000 lb-PM_{10}/year

As shown above, CAM is not required for PM_{10} emissions from this unit since the pre-control potential to emit is less than the major source threshold for PM_{10}.

i. *S-1203-16-4: 99 MMBtu/hr Union Iron Works Model MH Natural Gas/Propane-Fired Forced Draft Boiler with Variable Frequency Drive Blower, TODD Rapid Mix Burner, and Flue Gas Recirculation*

This boiler is equipped with a TODD Rapid Mix low NO_X burner and FGR for control of NO_X. The unit is not equipped with any add-on controls for SO_X, CO, VOC, or PM_{10} that would cause the unit to be subject to CAM requirements. Therefore, CAM is not required for SO_X, CO, VOC, or PM_{10}. The unit is equipped with add-on controls to reduce NO_X. Therefore, the unit may be subject to CAM for NO_X. The following calculations will show if the potential to emit will be greater than the major source threshold for NO_X.

<u>NO_X</u>
Major source threshold for NO_X: 20,000 lb-NO_X/year

Controlled emission factor for burner with FGR: 0.0085 lb-NO_X/MMBtu (7 ppmvd NO_X @ 3% O_2) (permit condition)

Pre-control emission factor for burner: 0.036 lb-NO_X/MMBtu (30 ppmvd NO_X @ 3% O_2) (estimate for the burner)

Maximum Annual Hours of Operation: 8,760 hr/yr

Controlled Annual Potential to Emit = 99 MMBtu/hr x 0.0085 lb-NO_X/MMBtu x 8,760 hr/yr = 7,372 lb-NO_X/year

Pre-control Annual Potential to Emit = 99 MMBtu/hr x 0.036 lb-NO_X/MMBtu x 8,760 hr/yr = 31,221 lb-NO_X/year

31,221 lb-NO_X/year ≥ 20,000 lb-NO_X/year

As shown above, CAM is required for NO_X emissions from this unit since the pre-control potential to emit is equal to or greater than the major source threshold for NO_X. However, because the controlled NO_X emissions from the unit are less than the Major Source Threshold, the unit is not a large pollutant-specific emissions unit as defined in 40 CFR §64.5. Pursuant to 40 CFR §64.5(b), deadlines for submittal for other pollutant-specific emission units, a CAM plan is not required until the time of the first renewal of the Title V permit; therefore, compliance with CAM will not be addressed in this initial Title V permit.

j. *S-1203-17-2: 113 bhp Ford Model WSG1068 Natural Gas/LPG-Fired Rich Burn Emergency Standby IC Engine with PCV, "Emit" 3-Way NSCR and Automatic Air/Fuel Ratio Controller, Powering an Electrical Generator*

This standby IC engine is equipped with a non-selective catalytic reduction (NSCR) to reduce emissions of NO_X, CO, and VOC. Therefore, the standby IC engine may be subject to CAM for NO_X, CO, or VOC. The following calculations will show if the potential to emit will be greater than the major source thresholds for NO_X, CO, or VOC.

<u>NO_X, CO, and VOC</u>
Major source thresholds:
NO_X: 20,000 lb-NO_X/year
CO: 200,000 lb-CO/year
VOC: 20,000 lb-VOC/year

Controlled Emission Factors for Engine (from permit condition)
NO_X: 1.0 g-NO_X/bhp-hr
CO: 3.73 g-CO/bhp-hr
VOC: 0.50 g-VOC/bhp-hr

Pre-Control Emission Factors for Engine (Maximum guaranteed emissions for the natural gas/LPG-fired engine without NSCR provided by the engine supplier)
NO_X: 12.6-NO_X/bhp-hr (LPG-firing for highest emissions)
CO: 25.6 g-CO/bhp-hr (LPG-firing for highest emissions)
VOC: 1.0 g-VOC/bhp-hr (Natural Gas or LPG)

Maximum Annual Hours of Operation = 100 hr/yr (permit condition)

Controlled Annual Potential to Emit:
NO_X: 113 bhp x 1.0 g-NO_X/bhp-hr x 1 lb/453.59 g x 100 hr/yr = 25 lb-NO_X/year

CO: 113 bhp x 3.73 g-CO/bhp-hr x 1 lb/453.59 g x 100 hr/yr = 93 lb-CO/year

VOC: 113 bhp x 0.50 g-VOC/bhp-hr x 1 lb/453.59 g x 100 hr/yr = 12 lb-VOC/year

Pre-control Annual Potential to Emit:
NO_X: 113 bhp x 12.6 g-NO_X/bhp-hr x 1 lb/453.59 g x 100 hr/yr = 314 lb-NO_X/year
314 lb-NO_X/year < 20,000 lb-NO_X/year

CO: 113 bhp x 25.6 g-CO/bhp-hr x 1 lb/453.59 g x 100 hr/yr = 638 lb-CO/year
638 lb-CO/year < 200,000 lb-CO/year

VOC: 113 bhp x 1.0 g-VOC/bhp-hr x 1 lb/453.59 g x 100 hr/yr = 25 lb-VOC/year
25 lb-VOC/year < 20,000 lb-VOC/year

As shown above, CAM is not required for NO_X, CO, or VOC. emissions from this unit since the pre-control potential to emit is less than the applicable major source thresholds for NO_X, CO, and VOC.

k. *S-1203-20-4: 63 MMBtu/hr Nebraska Model NOS-2-525 Natural Gas-Fired Boiler equipped with Alzeta Ultra Lo-NO_X Burner Model CSB30-3SO-30/30/EC*

This boiler is not equipped with any add-on controls for any pollutant that would cause the unit to be subject to CAM requirements. Therefore, CAM is not required.

l. *S-1203-21-1: Steam-Heated Lactose Dryer Served by two Mullberry Hill C&E baghouses, equipped with a Lactose Mill Served by one Mullberry Hill C&E baghouse*

This steam-heated lactose dryer and lactose mill are equipped with baghouse filters for control of particulate matter. Therefore, the units may be subject to CAM for PM_{10}. The following calculations will determine if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor: 0.002 gr/dscf. (permit condition)

Control efficiency for baghouses: 99%

Maximum Total Airflow Rate: 42,000 dscfm (2 x 15,000 dscfm + 12,000 dscfm) (permit condition)

Maximum Annual Operating Schedule: 7,965 hr/yr (permit condition)

Controlled Annual Potential to Emit = 0.002 gr/dscf x 42,000 dscf/min x 60 min/1 hr x 1 lb/7,000 gr x 7,965 hr/yr = 5,735 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 5,735 lb-PM_{10}/year ÷ (1 – 0.99) = 573,500 lb-PM_{10}/year

573,500 lb-PM_{10}/year ≥ 140,000 lb-PM_{10}/year

As shown above, CAM is required for PM_{10} emissions from this unit since the pre-control potential to emit is equal to or greater than the major source threshold for PM_{10}. However, because the controlled PM_{10} emissions from the unit are less than the Major Source Threshold, the unit is not a large pollutant-specific emissions unit as defined in 40 CFR §64.5. Pursuant to 40 CFR §64.5(b), deadlines for submittal for other pollutant-specific emission units, a CAM plan is not required until the time of the first renewal of the Title V permit; therefore, compliance with CAM will not be addressed in this initial Title V permit.

m. *S-1203-22-1: 90 MMBtu/hr Nebraska Model NS E 655 Natural Gas-Fired Boiler with a John Zink TODD Low NO_X Burner, Flue Gas Recirculation, and a URS Corporation Selective Catalytic Reduction (SCR) System*

This boiler is equipped with a low NO_X burner, FGR, and SCR for control of NO_X. The unit is not equipped with any add-on controls for SO_X, CO, VOC, or PM_{10} that would cause the unit to be subject to CAM requirements. Therefore, CAM is not required for SO_X, CO, VOC, or PM_{10}. The unit may be subject to CAM for NO_X since it is equipped with add-on controls to reduce NO_X. The following calculations will show if the potential to emit will be greater than the major source threshold for NO_X.

<u>NO_X</u>
Major source threshold for NO_X: 20,000 lb-NO_X/year

Controlled emission factor for unit with FGR and SCR: 0.0061 lb-NO_X/MMBtu (5 ppmvd NO_X @ 3% O_2) (permit condition)

Pre-control emission factor for burner: 0.036 lb-NO_X/MMBtu (30 ppmvd NO_X @ 3% O_2) (permit condition for startup when add-on controls are not operating)

Maximum Annual Hours of Operation: 8,760 hr/yr

Controlled Annual Potential to Emit = 90 MMBtu/hr x 0.0061 lb-NO_X/MMBtu x 8,760 hr/yr = 4,809 lb-NO_X/year

Pre-control Annual Potential to Emit = 90 MMBtu/hr x 0.036 lb-NO_X/MMBtu x 8,760 hr/yr = 28,382 lb-NO_X/year

28,382 lb-NO_X/year ≥ 20,000 lb-NO_X/year

As shown above, CAM is required for NO_X emissions from this unit since the pre-control potential to emit is equal to or greater than the major source threshold for NO_X. However, because the controlled NO_X emissions from the unit are less than the Major Source Threshold, the unit is not a large pollutant-specific emissions unit as defined in 40 CFR §64.5. Pursuant to 40 CFR §64.5(b), deadlines for submittal for other pollutant-specific emission units, a CAM plan is not required until the time of the first renewal of the Title V permit; therefore, compliance with CAM will not be addressed in this initial Title V permit.

n. *S-1203-23-1: 3,500 cu ft Lactose Powder Silo with Bin Vent Filter (Receiving Product from the Kason Vibroscreen Sifter)*

This silo is equipped with a bin vent filter for control of particulate matter. Therefore, the unit may be subject to CAM for PM_{10}. The following calculations will determine if the potential to emit will be greater than the major source threshold for PM_{10}.

<u>PM_{10}</u>
Major source threshold for PM_{10}: 140,000 lb-PM_{10}/year

Controlled emission factor: 0.002 gr/dscf. (permit condition)

Bin Vent control efficiency: 99%

Maximum Airflow Rate: 1,250 dscfm (permit condition)

Maximum Annual Operating Schedule: 7,965 hr/yr (permit condition)

Controlled Annual Potential to Emit = 0.002 gr/dscf x 1,250 dscf/min x 60 min/1 hr x 1 lb/7,000 gr x 7,965 hr/yr = 171 lb-PM_{10}/year

Pre-Control Annual Potential to Emit = 171 lb-PM_{10}/year ÷ (1 – 0.99) = 17,100 lb-PM_{10}/year

17,100 lb-PM_{10}/year < 140,000 lb-PM_{10}/year

As shown above, CAM is not required for PM_{10} emissions from this unit since the pre-control potential to emit is less than the major source threshold for PM_{10}.

37. 40 CFR Part 82, Subpart B and F – Stratospheric Ozone

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers, and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC).

a. *S-1203-0-1: Facility-Wide Requirements*

- Conditions 27-28 of the requirements of the facility-wide permit assure compliance with this rule.

X. PERMIT CONDITIONS

See draft operating permit beginning on the following page.

FACILITY: S-1203-0-1 **EXPIRATION DATE:** 01/31/2016

DRAFT

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and Tulare County Rule 111] Federally Enforceable Through Title V Permit

2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and Tulare County Rule 111] Federally Enforceable Through Title V Permit

3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit

4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit

5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit

6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit

8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit

12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit

13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit

14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit

15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit

16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit

17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit

18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit

19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit

21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101 and Tulare County Rule 401] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit

24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit

25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit

26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit

29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit

30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit

31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit

32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit

33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

39. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

40. On month, day, year, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-8-8 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
NIRO INC. MULTI-STAGE TYPE MSD 500 SPRAY DRYER WITH 15.0 MMBTU/HR NATURAL GAS/LPG DIRECT-FIRED MAXON ULTRA LOW NOX CROSSFIRE LINE BURNER AND 15.4 MMBTU/HR NATURAL GAS/LPG INDIRECT-FIRED TODD RAPID MIX ULTRA LOW NOX BURNER AND FGR, FEED SYSTEM INDIRECT HOT AIR SYSTEM, DRYING CHAMBER, EXHAUST AIR SYSTEM WITH FLUIDIZER ASSEMBLY, CYCLONE AND BAGHOUSE FILTER

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the indirect-fired TODD RMB burner. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the indirect-fired TODD RMB burner as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required for the indirect-fired TODD RMB burner. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of the indirect-fired TODD RMB burner, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of the indirect-fired TODD RMB burner, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that the indirect-fired TODD RMB burner is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
7. The dryer shall only be fired on natural gas with LPG as a backup fuel. [District Rules 2201, 4201, 4301, 4320, and 4801] Federally Enforceable Through Title V Permit
8. Permittee shall determine sulfur content of the natural gas combusted in the indirect-fired burner annually or shall demonstrate that the natural gas combusted is provided from a PUC or FERC regulated source. Permittee shall also determine sulfur content of the LPG combusted in the indirect-fired burner annually or shall demonstrate that the LPG combusted is provided from a commercial LPG source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
9. Emissions from fuel combustion when using the indirect-fired TODD RMB burner shall not exceed the following: NOx: 9 ppmv @ 3% O2 or 0.011 lb/MMBtu, CO: 0.037 lb/MMBtu, VOC: 0.0055 lb/MMBtu, PM10: 0.0076 lb/MMBtu, or SOx (calculated as SO2) 0.0029 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Emissions from fuel combustion when using the direct-fired Maxon burner shall not exceed the following: NOx: 2.2 ppmv @ stack conditions (if > 19% O2, otherwise corrected to 19% O2) or 0.0243 lb/MMBtu, CO: 42 ppmv @ 19% O2 (if > 19% O2, otherwise corrected to 19% O2) or 0.2924 lb/MMBtu, VOC: 0.0055 lb/MMBtu, PM10: 0.0076 lb/MMBtu, or SOx (calculated as SO2) 0.0029 lb/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

11. Non-combustion PM10 emissions from baghouse shall not exceed 0.344 lb/ton. [District Rules 2201 and 4202] Federally Enforceable Through Title V Permit

12. Maximum daily productions of the Whey Protein Concentrate (WPC) shall not exceed 50 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit

13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4309, and 4320] Federally Enforceable Through Title V Permit

14. 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 4320 (adopted 10/16/2008). [District Rules 4305, 4306, 4309, and 4320] Federally Enforceable Through Title V Permit

15. 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 Rules 4305, 4306, 4309, and 4320] Federally Enforceable Through Title V Permit

16. Source testing of the indirect-fired TODD RMB burner to measure natural gas-combustion NOx and CO emissions shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. Source testing of the direct-fired Maxon burner to measure natural gas-combustion NOx and CO emissions shall be conducted within 60 days of initial start-up using the Maxon burner and at least once every 24 months thereafter. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

18. 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

19. 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

20. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, 4309, and 4320] Federally Enforceable Through Title V Permit

21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4309, and 4320] Federally Enforceable Through Title V Permit

22. When testing the emissions while operating with the direct-fired Maxon burner, 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

23. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4309, and 4320] Federally Enforceable Through Title V Permit

24. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 Rules 4305, 4306, 4309, and 4320] Federally Enforceable Through Title V Permit

26. When operating the dryer with the indirect-fired TODD burner, if either the NOx or CO concentrations corrected to 3% O2, as measured by the portable 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 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

27. When operating the dryer with the direct-fired Maxon burner, if either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable 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 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

28. 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 Rules 4305, 4306, 4309, and 4320] Federally Enforceable Through Title V Permit

29. When operating the dryer with the indirect-fired TODD burner, the permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

30. When operating the dryer with the direct-fired Maxon burner, the permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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

31. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit

32. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

33. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

34. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit

35. The baghouse shall be equipped with a 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

36. Daily log of WPC productions shall be maintained, kept, and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

37. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

38. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

39. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

40. Records of dust collector maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of the type and amount of each fuel combusted in the indirect-fired burner during each calendar month. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit

42. 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, 2520, 9.4.2, 4305, 4306, 4309, and 4320 and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-9-6 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
22.4 MMBTU/HR NIRO INC. TALL FORM DIRECT HEAT SPRAY DRYER MODEL 1600 CONSISTING OF FEED SYSTEM, DRYING CHAMBER, HOLDING BELT, AND WET SCRUBBER

PERMIT UNIT REQUIREMENTS

1. 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
2. Dryer shall be fired only on natural gas except LPG may be burned when natural gas has been curtailed. [District Rules 2201, 4201, 4301, and 4801] Federally Enforceable Through Title V Permit
3. Dryer shall be equipped with operational fuel gauge to Niro burners. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Scrubber, including sprays and nozzles, shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Scrubber shall be equipped with an operational differential pressure gauge to indicate the pressure drop across the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All dryer exhaust gas shall be scrubbed in scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Scrubbed emissions from the dryer shall not exceed any of the following: PM10 0.56 lb/ton deproteinized whey produced; NOx 1.8 ppmv at stack conditions (0.02 lb/MMBtu) calculated as NO2; CO 21.3 ppmv at stack conditions (0.1481 lb/MMBtu); VOC 0.13 lb/hr; or SOx 0.07 lb/hr (calculated as SO2). [District Rules 2201, 4202, and 4309] Federally Enforceable Through Title V Permit
9. Compliance testing shall be conducted at a firing rate of at least 80% of the maximum firing rate. If test results extrapolated to 100% firing rate (lb/hr emissions x 100/percent firing rate) do not project compliance, firing rate shall be limited to that measured during test which demonstrated compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum daily productions of the deproteinized whey shall not exceed 242 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable 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 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 performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit

13. 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

14. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted annually using EPA Method 5, or CARB 501 in combination with CARB 5. [District Rule 2201] Federally Enforceable Through Title V Permit

15. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

16. 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 (adopted 12-15-2005). [District Rule 4309] Federally Enforceable Through Title V Permit

17. 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

18. 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

19. 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

20. 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

21. 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

22. 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

23. The results of each compliance test shall be submitted to the District within 60 days. [District Rule 1081] Federally Enforceable Through Title V Permit

24. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. Records of monthly average fuel flow to dryer shall be kept for 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
26. If fuel firing rate to dryer is limited to that measured during the source test as required by Condition 10, records of daily fuel flow to dryer shall be kept. [District Rule 1070 and 2520] Federally Enforceable Through Title V Permit
27. Permittee shall maintain daily records of deproteinized whey production. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Pressure differential across the scrubber shall be observed and recorded weekly during operation of this unit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. Records of pressure differential across the scrubber 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] Federally Enforceable Through Title V Permit
30. 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, 2520, 9.4, and 4309] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-10-2 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
37,375 GALLON (5,000 CU. FT.) WHEY POWDER STORAGE SILO "A" WITH BIN VENT, 3 HP POWER SILO BIN DISCHARGER, AND 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. 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
2. Maximum quantity of dried whey powder conveyed into this silo shall not exceed 220 tons/day. [District Rules 2201 and 4202] Federally Enforceable Through Title V Permit
3. The total throughput of dried whey products handled by the silos S-1203-10 and S-1203-11 shall not exceed 220 tons/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from bin vent filters shall not exceed 0.015 lb/ton of powder conveyed into silo. [District Rules 2201, 4201, and 4202] Federally Enforceable Through Title V Permit
5. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
7. Permittee shall perform a complete vent filter inspection on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Records of vent filter maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit
9. Permittee shall maintain a daily record of the quantity of dry powder conveyed into this silo and the total daily throughput of silos S-1203-10 and S-1203-11. Records shall be kept for a period of five years and made available for District inspection upon request. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-11-2 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
37,375 GALLON (5,000 CU. FT.) WHEY POWDER STORAGE SILO "B" WITH BIN VENT, 3 HP POWER SILO BIN DISCHARGER, AND 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. 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
2. Maximum quantity of dried whey powder conveyed into this silo shall not exceed 220 tons/day. [District Rules 2201 and 4202] Federally Enforceable Through Title V Permit
3. The total throughput of dried whey products handled by the silos S-1203-10 and S-1203-11 shall not exceed 220 tons/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from bin vent filters shall not exceed 0.015 lb/ton of powder conveyed into silo. [District Rules 2201, 4201, and 4202] Federally Enforceable Through Title V Permit
5. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
7. Permittee shall perform a complete vent filter inspection on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Records of vent filter maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit
9. Permittee shall maintain a daily record of the quantity of dry powder conveyed into this silo and the total daily throughput of silos S-1203-10 and S-1203-11. Records shall be kept for a period of five years and made available for District inspection upon request. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-12-2 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
26,162 GALLON (3,500 CU. FT.) WHEY POWDER STORAGE SILO "C" WITH BIN VENT, 3 HP POWDER SILO BIN DISCHARGER, 2 HP BIN VENT EXHAUST FAN, AND 1 HP CONVEY-THRU ROTARY AIRLOCK

PERMIT UNIT REQUIREMENTS

1. 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
2. PM10 emissions from bin vent filters shall not exceed 0.015 lb/ton of powder conveyed into silo. [District Rules 2201, 4201, and 4202] Federally Enforceable Through Title V Permit
3. Maximum quantity of dried whey powder conveyed into silo shall not exceed 55 tons/day. [District Rules 2201 and 4202] Federally Enforceable Through Title V Permit
4. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
6. Permittee shall perform a complete vent filter inspection on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Records of vent filter maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit
8. Permittee shall maintain a daily record of the quantity of dry powder conveyed into the silo. Records shall be kept for a period of five years and made available for District inspection upon request. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-13-1 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
AVAPAC BULK BAG FILLING SYSTEM INCLUDING MODEL C-63-00 BULK BAG FILLING MACHINE, 350 CUBIC FOOT SURGE HOPPER WITH NUCON BIN VENT SERVED BY A MODEL NCRD 102-100-3T DUST COLLECTOR SHARED WITH S-1203-14 AND S-1203-15

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
2. The maximum daily whey products processed by this Avapac Bulk Bag filling system shall not exceed 280 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall be equipped with a 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
8. PM10 emissions shall not exceed 0.004 lb/ton of product. [District Rules 2201 and 4202] Federally Enforceable Through Title V Permit
9. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
11. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of dust collector maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. Permittee shall maintain accurate records of daily whey production. Records shall be made readily available for District inspection upon request for a period of 5 years. [District Rule 2201] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-14-1 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
AVAPAC CAROUSEL BAG FILLING SYSTEM SERVED BY DUST COLLECTOR SYSTEM LISTED ON PERMIT S-1203-13

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
2. The maximum daily whey products processed by this Avapac Carousel bagging system shall not exceed 280 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall be equipped with a 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
8. PM10 emissions shall not exceed 0.004 lb/ton of product. [District Rules 2201 and 4202] Federally Enforceable Through Title V Permit
9. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
11. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of dust collector maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. Permittee shall maintain accurate records of daily whey production. Records shall be made readily available for District inspection upon request for a period of 5 years. [District Rule 2201] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-15-1 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
AVAPAC INLINE BAG FILLING SYSTEM INCLUDING 350 CUBIC FOOT POWDER SURGE HOPPER SERVED BY DUST COLLECTOR LISTED WITH S-1203-13

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
2. The maximum daily whey products processed by this Avapac Inline bagging system shall not exceed 280 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall be equipped with a 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
8. PM10 emissions shall not exceed 0.004 lb/ton of product. [District Rules 2201 and 4202] Federally Enforceable Through Title V Permit
9. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
11. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of dust collector maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. Permittee shall maintain accurate records of daily whey production. Records shall be made readily available for District inspection upon request for a period of 5 years. [District Rule 2201] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-16-4 **EXPIRATION DATE:** 01/31/2016

EQUIPMENT DESCRIPTION:
99 MMBTU/HR UNION IRON WORKS MODEL MH NATURAL GAS/PROPANE-FIRED FORCED DRAFT BOILER WITH VARIABLE FREQUENCY DRIVE BLOWER, TODD RAPID MIX BURNER, AND FLUE GAS RECIRCULATION

PERMIT UNIT REQUIREMENTS

1. 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
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The boiler shall only be fired on PUC-regulated natural gas or propane. [District Rules 2201, 4301, and 4320] Federally Enforceable Through Title V Permit
5. Permittee shall demonstrate that the natural gas combusted is provided from a PUC regulated source and shall determine the sulfur content of propane combusted annually or demonstrate that the propane combusted is provided from a commercial propane source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
6. Emission rates from natural gas or propane firing shall not exceed any of the following: 7 ppmvd-NOx @ 3% O2 or 0.0085 lb-NOx/MMBtu, 0.008 lb-PM10/MMBtu, 0.006 lb-VOC/MMBtu, 0.017 lb-SOx (as SO2)/MMBtu, or 50 ppmvd-CO @ 3% O2. [District Rules 2201, 4305, 4306, 4320, and 4801] Federally Enforceable Through Title V Permit
7. The combined annual emissions from permit units S-1203-16, S-1203-20, and S-1203-22 shall not exceed any of the following limits: 15,611 lb-NOx; 16,343 lb-SOx; 11,132 lb-PM10; 64,649 lb-CO; or 8,238 lb-VOC. [District Rule 2201] Federally Enforceable Through Title V Permit
8. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
9. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable 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 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 performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

12. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

13. Source test to demonstrate compliance with NOx and CO emission limits while firing on propane shall be conducted within 60 days of the initial propane firing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit

14. 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 4320 (adopted 10/16/2008). [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. 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

18. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

19. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

20. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

21. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit

22. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. 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

24. Permittee shall keep an ongoing record of the combined emissions for permit unit S-1203-16, S-1203-20, and S-1203-22 for each calendar year. The record shall be updated at least monthly. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit

25. Permittee shall maintain records of the type and amount of each fuel combusted during each calendar month. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit

26. 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, 2520, 4305, 4306, and 4320 and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-17-2 **EXPIRATION DATE:** 01/31/2016

DRAFT

EQUIPMENT DESCRIPTION:
113 BHP FORD MODEL WSG1068 NATURAL GAS/LPG-FIRED RICH BURN EMERGENCY STANDBY IC ENGINE WITH PCV, "EMIT" 3 WAY NSCR AND AUTOMATIC AIR/FUEL RATIO CONTROLLER, POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
3. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. This engine shall only be fired on PUC quality natural gas, LPG, or propane. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. This engine shall be equipped with an operational non-selective catalyst installed on the exhaust stack. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from this engine shall not exceed any of the following limits: 1.0 g-NOx/hp-hr, 0.0094 g-SOx/hp-hr, 0.0329 g-PM10/hp-hr, 3.73 g-CO/hp-hr, or 0.50 g-VOC/hp-hr. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 2201 and 4702, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
10. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rules 2201 and 4702, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
11. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit

13. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

14. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 2520, 9.4 and 4702, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

15. On and after October 19, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

16. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

17. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

18. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

19. The engine's spark plugs shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

20. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

21. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rules 1070 and 2520, 9.4 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

22. 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, 2520, 9.4, 4702, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-20-4 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
63 MMBTU/HR NEBRASKA MODEL NOS-2-525 NATURAL GAS-FIRED BOILER EQUIPPED WITH ALZETA ULTRA LO-NOX BURNER MODEL CSB30-3SO-30/30/EC

PERMIT UNIT REQUIREMENTS

1. 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
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201, 4301, and 4320] Federally Enforceable Through Title V Permit
5. Permittee shall shall demonstrate that the combusted gas is provided from a PUC regulated source. [District Rule 4320] Federally Enforceable Through Title V Permit
6. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd-NOx @ 3% O2 or 0.0085 lb-NOx/MMBtu, 0.0029 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 80 ppmvd-CO @ 3% O2, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 4320, and 4801] Federally Enforceable Through Title V Permit
7. The combined annual emissions from permit units S-1203-16, S-1203-20, and S-1203-22 shall not exceed any of the following limits: 15,611 lb-NOx; 16,343 lb-SOx; 11,132 lb-PM10; 64,649 lb-CO; or 8,238 lb-VOC. [District Rule 2201] Federally Enforceable Through Title V Permit
8. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
9. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable 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 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 performing the notification and testing required by this condition [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

11. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

12. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

13. 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 4320 (adopted 10/16/2008). [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

14. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. 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

18. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

19. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

20. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

21. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

22. 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

23. Permittee shall keep an ongoing record of the combined emissions for permit unit S-1203-16, S-1203-20, and S-1203-22 for each calendar year. The record shall be updated at least monthly. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit

24. Permittee shall maintain records of the type and amount of each fuel combusted during each calendar month. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit

25. 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, 2520, 4305, 4306, and 4320 and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-21-1 **EXPIRATION DATE:** 01/31/2016

EQUIPMENT DESCRIPTION:
STEAM-HEATED LACTOSE DRYER SERVED BY TWO MULLBERRY HILL C&E BAGHOUSES, EQUIPPED WITH A LACTOSE MILL SERVED BY ONE MULLBERRY HILL C&E BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The lactose dryer and lactose mill shall not operate for more than 7,965 hours per year, each. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Airflow rate from the baghouses serving the lactose dryer shall not exceed 15,000 dscfm each. Airflow rate from the baghouse serving the lactose mill shall not exceed 12,000 dscfm. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall be equipped with a 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
8. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the baghouses shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
11. Emissions from the exhaust of the baghouses serving the lactose dryer and lactose mill shall not exceed 0.002 gr/dscf. [District Rules 2201 and 4202] Federally Enforceable Through Title V Permit
12. Permittee shall record the daily and annual hours of operation of the lactose dryer and lactose mill. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

15. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-22-1 **EXPIRATION DATE:** 01/31/2016

EQUIPMENT DESCRIPTION:
90 MMBTU/HR NEBRASKA MODEL NS E 655 NATURAL GAS-FIRED BOILER WITH A JOHN ZINK TODD LOW NOX BURNER, FLUE GAS RECIRCULATION, AND A URS CORPORATION SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201, 4301, and 4320] Federally Enforceable Through Title V Permit
5. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
6. Except during startup, emissions from the natural gas-fired boiler shall not exceed any of the following limits: 5 ppmvd-NOx @ 3% O2 or 0.0061 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmvd-CO @ 3% O2 or 0.037 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 4320, and 4801] Federally Enforceable Through Title V Permit
7. During startup, emissions from the natural gas-fired boiler shall not exceed 30 ppmvd-NOx @ 3% O2 or 0.036 lb-NOx/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ammonia (NH3) emissions from the exhaust of the SCR system serving this boiler shall not exceed 10 ppmvd @ 3% O2. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
9. The combined annual emissions from permit units S-1203-16, S-1203-20, and S-1203-22 shall not exceed any of the following limits: 15,611 lb-NOx; 16,343 lb-SOx; 11,132 lb-PM10; 64,649 lb-CO; or 8,238 lb-VOC. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Duration of start-up shall not exceed either of the following: 2 hours per occurrence or 4 hours per day. During start-up, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
12. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NH3 at least once during each month in which a source test is not performed. NH3 monitoring shall be conducted utilizing District approved gas-detection tubes or a District approved equivalent method. 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 one day of restarting the unit unless monitoring has been performed within the last month. [District Rule 4102]

15. NH3 emission readings shall be conducted at the time the NOx, CO, and O2 readings are taken. The NH3 readings shall be converted to ppmvd and corrected to 3% O2. [District Rule 4102]

16. If the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, or the NH3 concentrations corrected to 3% O2, as measured by District approved gas-detection tubes, 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 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 Rules 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. All NOx, CO, O2, and NH3 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 NOx, CO, and O2 analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. NH3 emission readings shall be measured in accordance with the gas sample tube manufacturer's specifications and recommendations. 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 Rules 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

18. 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 4320 (adopted 10/16/2008). [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

19. Source testing to measure NOx, CO, and NH3 emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

21. 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

22. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
26. Source testing for ammonia emissions shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 2201] 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. The permittee shall maintain records of: (1) the date and time of NOx, CO, O2 and NH3 measurements, (2) the O2 concentration in percent and the measured NOx, CO, and NH3 concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records of the type and amount of each fuel combusted during each calendar month. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
31. Daily records of startup durations and number of occurences of each shall be maintained. [District Rules 2201, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Permittee shall keep an ongoing record of the combined emissions for permit unit S-1203-16, S-1203-20, and S-1203-22 for each calendar year. The record shall be updated at least monthly. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
33. 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, 2520, 4305, 4306, and 4320 and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-23-1 **EXPIRATION DATE:** 01/31/2016

DRAFT

EQUIPMENT DESCRIPTION:
3500 CU FT LACTOSE POWDER SILO WITH BIN VENT FILTER (RECEIVING PRODUCT FROM THE KASON VIBROSCREEN SIFTER)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The bin vent filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Airflow rate from the bin vent filter serving the lactose storage silo shall not exceed 1,250 dscfm. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The lactose storage silo shall not be loaded for more than 7,965 hours per year, each. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Replacement bags numbering at least 10% of the total number of bags in the bin vent filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from the bin vent filter shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
9. Emissions from the exhaust of the bin vent filter serving the lactose storage silo shall not exceed 0.002 gr/dscf. [District Rule 2201 and and 4202] Federally Enforceable Through Title V Permit
10. Records of all maintenance of the bin vent filter, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall record the daily and annual hours of loading of the lactose storage silo. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Visible emissions from the source during operation shall be evaluated using EPA method 22 at least once per calendar quarter. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Records of visible emissions monitoring results shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

DRAFT

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. Permittee shall perform a complete vent filter inspection on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Records of vent filter maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit
16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and and 2520, 9.4.2] Federally Enforceable Through Title V Permit

Attachment A

Detailed Facility Printout

Detailed Facility Report

For Facility=1203

Sorted by Facility Name and Permit Number

SAPUTO CHEESE USA INC	FAC #	**S 1203**	TYPE: **TitleV**	EXPIRE ON:	01/31/2016
800 E PAIGE AVE	STATUS:	**A**	TOXIC ID:	AREA:	22 /
TULARE, CA 93274	TELEPHONE:	**8472671100**		INSP. DATE:	05/14

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-1203-1-2	8.4 MMBTU/HR BOILER	3020-02 G	1	815.00	815.00	D	DORMANT 8.4 MMBTU/HR CLEAVER BROOKS MODEL CB 400-200 NATURAL GAS/PROPANE FIRED BOILER
S-1203-2-2	8.4 MMBTU/HR BOILER	3020-02 G	1	815.00	815.00	D	DORMANT 8.4 MMBTU/HR CLEAVER BROOKS MODEL CB 400-200 NATURAL GAS/PROPANE FIRED BOILER
S-1203-3-3	21.0 MM BTU/HR	3020-02 H	1	1,030.00	1,030.00	D	21 MMBTU/HR CLEAVER BROOKS MODEL CB 700-500 NATURAL GAS/PROPANE-FIRED BOILER WITH FLUE GAS RECIRCULATION
S-1203-4-1	3 MMBTU/HR OVEN	3020-02 F	1	607.00	607.00	D	ENERSYST PIZZA OVEN WITH NATURAL GAS/PROPANE FIRED MAXON MODEL 400 OVENPACK #405 3 MMBTU/HR BURNER AND DOUGH PROCESS EQUIPMENT - CANCELED PER APPLICANT LETTER DATED 2/10/98 (MSL, 2/19/98)
S-1203-5-0	13,292 GALLONS	3020-05 B	1	93.00	93.00	D	60,000 POUND CAPACITY (13,292 GALLONS) FLOUR SILO #1 WITH PNEUMATIC LOADING AND BAGHOUSE (SHARED WITH S-1203-6)
S-1203-6-0	13,292 GALLONS	3020-05 B	1	93.00	93.00	D	60,000 POUND CAPACITY (13,292 GALLONS) FLOUR SILO #2 WITH PNEUMATIC LOADING AND BAGHOUSE (SHARED WITH S-1203-5)
S-1203-7-0	20 HP	3020-01 A	1	87.00	87.00	D	FLOUR HANDLING SYSTEM WITH SIFTER, SCALE RECEIVER WITH BAG FILTER, MIXING CART(S), AND 20 HP VACUUM PUMP WITH FILTER
S-1203-8-7	15.4 MMBtu/hr burner	3020-02 H	1	1,030.00	1,030.00	A	NIRO INC. MULTI STAGE TYPE MSD 500 SPRAY DRYER WITH 15.0 MMBTU/HR NATURAL GAS/LPG DIRECT-FIRED MAXON ULTRA LOW NOX, CROSSFIRE LINE BURNER AND 15.4 MMBTU/HR NATURAL GAS/LPG INDIRECT-FIRED TODD RAPID MIX ULTRA LOW NOX BURNER AND FGR, FEED SYSTEM INDIRECT HOT AIR SYSTEM, DRYING CHAMBER, EXHAUST AIR SYSTEM WITH FLUIDIZER ASSEMBLY, CYCLONE AND BAGHOUSE FILTER
S-1203-9-5	22.4 MMBTU/HR DRYER	3020-02 H	1	1,030.00	1,030.00	A	22.4 MMBTU/HR NIRO INC. TALL FORM DIRECT HEAT SPRAY DRYER MODEL 1600 CONSISTING OF FEED SYSTEM, DRYING CHAMBER, HOLDING BELT, AND WET SCRUBBER
S-1203-10-1	37,375 GALLONS	3020-05 C	1	135.00	135.00	A	37,375 GALLON (5,000 CU. FT.) WHEY POWDER STORAGE SILO "A" WITH BIN VENT, 3 HP POWER SILO BIN DISCHARGER, AND 2 HP EXHAUST FAN
S-1203-11-1	37,375 GALLONS	3020-05 C	1	135.00	135.00	A	37,375 GALLON (5,000 CU. FT.) WHEY POWDER STORAGE SILO "B" WITH BIN VENT, 3 HP POWER SILO BIN DISCHARGER, AND 2 HP EXHAUST FAN
S-1203-12-1	26,162 gallons	3020-05 C	1	135.00	135.00	A	26,162 GALLON (3,500 CU. FT.) WHEY POWDER STORAGE SILO "C" WITH BIN VENT, 3 HP POWDER SILO BIN DISCHARGER, 2 HP BIN VENT EXHAUST FAN, AND 1 HP CONVEY-THRU ROTARY AIRLOCK
S-1203-13-0	3.75 HORSEPOWER	3020-01 A	1	87.00	87.00	A	AVAPAC BULK BAG FILLING SYSTEM INCLUDING MODEL C-63-00 BULK BAG FILLING MACHINE, 350 CUBIC FOOT SURGE HOPPER WITH NUCON BIN VENT SERVED BY A MODEL NCRD 102-100-3T DUST COLLECTOR SHARED WITH S-1203-14 AND S-1203-15

Detailed Facility Report

For Facility=1203

Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-1203-14-0	39.5 HORSEPOWER	3020-01 B	1	117.00	117.00	A	AVAPAC CAROUSEL BAG FILLING SYSTEM SERVED BY DUST COLLECTOR SYSTEM LISTED WITH S-1203-13
S-1203-15-0	55.5 HORSEPOWER	3020-01 C	1	197.00	197.00	A	AVAPAC INLINE BAG FILLING SYSTEM INCLUDING 350 CUBIC FOOT POWDER SURGE HOPPER SERVED BY DUST COLLECTOR LISTED WITH S-1203-13
S-1203-16-3	99 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	99 MMBTU/HR UNION IRON WORKS MODEL MH NATURAL GAS/PROPANE-FIRED FORCED DRAFT BOILER WITH VARIABLE FREQUENCY DRIVE BLOWER, TODD RAPID MIX BURNER, AND FLUE GAS RECIRCULATION
S-1203-17-1	113 bhp	3020-10 B	1	117.00	117.00	A	113 BHP FORD MODEL WSG1068 NATURAL GAS/LPG-FIRED RICH BURN EMERGENCY STANDBY IC ENGINE WITH PCV, "EMIT" 3 WAY NSCR AND AUTOMATIC AIR/FUEL RATIO CONTROLLER, POWERING AN ELECTRICAL GENERATOR
S-1203-19-0	63,000 KBTU/HR TREU BOILER	3020-02 H	1	1,030.00	1,030.00	D	63 MMBTU/HR NEBRASKA MODEL NOS-2-525 NATURAL GAS-FIRED BOILER EQUIPPED WITH ALZETA ULTRA LO-NOX BURNER MODEL CSB30-3SO-30/30/EC AS TEMPORARY REPLACEMENT EMISSIONS UNIT FOR UNIT S-1203-16.
S-1203-20-3	63 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	63 MMBTU/HR NEBRASKA MODEL NOS-2-525 NATURAL GAS-FIRED BOILER EQUIPPED WITH ALZETA ULTRA LO-NOX BURNER MODEL CSB30-3SO-30/30/EC
S-1203-21-0	232 electrical HP	3020-01 E	1	412.00	412.00	A	STEAM-HEATED LACTOSE DRYER SERVED BY TWO MULLBERRY HILL C&E BAGHOUSES, EQUIPPED WITH A LACTOSE MILL SERVED BY ONE MULLBERRY HILL C&E BAGHOUSE
S-1203-22-0	90 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	90 MMBTU/HR NEBRASKA MODEL NS E 655 NATURAL GAS-FIRED BOILER WITH A JOHN ZINK TODD LOW NOX BURNER, FLUE GAS RECIRCULATION, AND A URS CORPORATION SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM
S-1203-23-0	26,181 gallons	3020-05 C	1	135.00	135.00	A	3500 CU FT LACTOSE POWDER SILO WITH BIN VENT FILTER (RECEIVING PRODUCT FROM THE KASON VIBROSCREEN SIFTER)

Number of Facilities Reported: 1

Attachment B

Current District PTOs

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

Permit to Operate

FACILITY: S-1203 **EXPIRATION DATE:** 01/31/2016

LEGAL OWNER OR OPERATOR: SAPUTO CHEESE USA INC
MAILING ADDRESS: 800 E PAIGE AVE
TULARE, CA 93274

FACILITY LOCATION: 800 E PAIGE AVE
TULARE, CA 93274

FACILITY DESCRIPTION: CHEESE PRODUCTION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

Oct 17 2013 10:42AM – NORMANR

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-8-7 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
NIRO INC. MULTI STAGE TYPE MSD 500 SPRAY DRYER WITH 15.0 MMBTU/HR NATURAL GAS/LPG DIRECT-FIRED MAXON ULTRA LOW NOX, CROSSFIRE LINE BURNER AND 15.4 MMBTU/HR NATURAL GAS/LPG INDIRECT-FIRED TODD RAPID MIX ULTRA LOW NOX BURNER AND FGR, FEED SYSTEM INDIRECT HOT AIR SYSTEM, DRYING CHAMBER, EXHAUST AIR SYSTEM WITH FLUIDIZER ASSEMBLY, CYCLONE AND BAGHOUSE FILTER

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the indirect-fired TODD RMB burner. [District Rule 2080]
2. Permittee shall submit written notification to the District upon designating the indirect-fired TODD RMB burner as dormant or active. [District Rule 2080]
3. While dormant, normal source testing shall not be required for the indirect-fired TODD RMB burner. [District Rule 2080]
4. Upon recommencing operation of the indirect-fired TODD RMB burner, normal source testing shall resume. [District Rule 2080]
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of the indirect-fired TODD RMB burner, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]
6. Records of all dates and times that the indirect-fired TODD RMB burner is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
7. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
8. The dryer shall only be fired on natural gas with LPG as a backup fuel. [District Rules 2201, 4201, 4301, and 4801]
9. Emissions from fuel combustion when using the indirect-fired TODD RMB burner shall not exceed the following: NOx: 9 ppmv @ 3% O2 or 0.011 lb/MMBtu, CO: 0.037 lb/MMBtu, VOC: 0.0055 lb/MMBtu, PM10: 0.0076 lb/MMBtu, or SOx (calculated as SO2) 0.0029 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320]
10. Emissions from fuel combustion when using the direct-fired Maxon burner shall not exceed the following: NOx: 2.2 ppmv @ stack conditions (if >19% O2, otherwise corrected to 19% O2) or 0.0243 lb/MMBtu, CO: 42 ppmv @ 19% O2(if > 19% O2, otherwise corrected to 19% O2) or 0.2924 lb/MMBtu, VOC: 0.0055 lb/MMBtu, PM10: 0.0076 lb/MMBtu, or SOx (calculated as SO2) 0.0029 lb/MMBtu. [District Rules 2201 and 4309]
11. Non-combustion PM10 emissions from baghouse shall not exceed 0.344 lb/ton. [District Rules 2201 and 4202]
12. Maximum daily productions of the Whey Protein Concentrate (WPC) shall not exceed 50 ton/day. [District Rule 2201]
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4309, and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. 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 4306. [District Rules 4305, 4306, 4309, and 4320]

15. 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 Rules 4305, 4306, 4309, and 4320]

16. Source testing of the indirect-fired TODD RMB burner to measure natural gas-combustion NOx and CO emissions shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320]

17. Source testing of the direct-fired Maxon burner to measure natural gas-combustion NOx and CO emissions shall be conducted within 60 days of initial start-up using the Maxon burner and at least once every 24 months thereafter. [District Rules 2201 and 4309]

18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

19. 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]

20. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, 4309, and 4320]

21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4309, and 4320]

22. When testing the emissions while operating with the direct-fired Maxon burner, 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]

23. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4309, and 4320]

24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 Rules 4305, 4306, 4309, and 4320]

25. When operating the dryer with the indirect-fired TODD burner, if either the NOx or CO concentrations corrected to 3% O2, as measured by the portable 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 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 Rules 4305, 4306, and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

26. When operating the dryer with the direct-fired Maxon burner, if either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable 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 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]

27. 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 Rules 4305, 4306, 4309, and 4320]

28. When operating the dryer with the indirect-fired TODD burner, the permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% 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 Rules 4305, 4306, and 4320]

29. When operating the dryer with the direct-fired Maxon burner, the permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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]

30. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]

31. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]

32. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101]

33. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]

34. The baghouse shall be equipped with a 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]

35. Daily log of WPC productions shall be maintained, kept, and made available for District inspection upon request. [District Rule 2201]

36. 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, 4306, 4309, and 4320]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-9-5 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
22.4 MMBTU/HR NIRO INC. TALL FORM DIRECT HEAT SPRAY DRYER MODEL 1600 CONSISTING OF FEED SYSTEM, DRYING CHAMBER, HOLDING BELT, AND WET SCRUBBER

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. Dryer shall be fired only on natural gas except LPG may be burned when natural gas has been curtailed. [District Rules 2201, 4201, 4301, and 4801]
4. Dryer shall be equipped with operational fuel gauge to Niro burners. [District Rule 2201]
5. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201]
6. Scrubber, including sprays and nozzles, shall be maintained in optimum working condition. [District Rule 2201]
7. Scrubber shall be equipped with an operational differential pressure gauge to indicate the pressure drop across the unit. [District Rule 2201]
8. All dryer exhaust gas shall be scrubbed in scrubber. [District Rule 2201]
9. Scrubbed emissions from the dryer shall not exceed any of the following: PM10 0.56 lb/ton deproteinized whey produced; NOx 1.8 ppmv at stack conditions (0.02 lb/MMBtu) calculated as NO2; CO 21.3 ppmv at stack conditions (0.1481 lb/MMBtu); VOC 0.13 lb/hr; or SOx 0.07 lb/hr (calculated as SO2). [District Rule 2201, 4202 and 4309]
10. Compliance testing shall be conducted at a firing rate of at least 80% of the maximum firing rate. If test results extrapolated to 100% firing rate (lb/hr emissions x 100/percent firing rate) do not project compliance, firing rate shall be limited to that measured during test which demonstrated compliance. [District Rule 2201]
11. Maximum daily productions of the deproteinized whey shall not exceed 242 ton/day. [District Rule 2201]
12. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable 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 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 performing the notification and testing required by this condition. [District Rule 4309]
14. 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]
15. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted annually using EPA Method 5, or CARB 501 in combination with CARB 5. [District Rule 2201]
16. 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]
17. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
18. 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]
19. 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]
20. 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]
21. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
23. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
24. The results of each compliance test shall be submitted to the District within 60 days. [District Rule 1081]
25. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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]
26. Records of monthly average fuel flow to dryer shall be kept for 5 years and shall be made readily available for District inspection upon request. [District Rule 1070]
27. If fuel firing rate to dryer is limited to that measured during the source test as required by Condition 10, records of daily fuel flow to dryer shall be kept. [District Rule 1070]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

28. Permittee shall maintain daily records of deproteinized whey production. [District Rule 2201]
29. 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]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-10-1 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
37,375 GALLON (5,000 CU. FT.) WHEY POWDER STORAGE SILO "A" WITH BIN VENT, 3 HP POWER SILO BIN DISCHARGER, AND 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Maximum quantity of dried whey powder conveyed into this silo shall not exceed 220 tons/day. [District Rules 2201 and 4202]
3. The total throughput of dried whey products handled by the silos S-1203-10 and S-1203-11 shall not exceed 220 tons/day. [District Rule 2201]
4. 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]
5. PM10 emissions from bin vent filters shall not exceed 0.015 lb/ton of powder conveyed into silo. [District Rules 2201, 4201, and 4202]
6. Permittee shall maintain a daily record of the quantity of dry powder conveyed into this silo and the total daily throughput of silos S-1203-10 and S-1203-11. Records shall be kept for a period of five years and made available for District inspection upon request. [District Rule 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-11-1 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
37,375 GALLON (5,000 CU. FT.) WHEY POWDER STORAGE SILO "B" WITH BIN VENT, 3 HP POWER SILO BIN DISCHARGER, AND 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Maximum quantity of dried whey powder conveyed into this silo shall not exceed 220 tons/day. [District Rules 2201 and 4202]
3. The total throughput of dried whey products handled by the silos S-1203-10 and S-1203-11 shall not exceed 220 tons/day. [District Rule 2201]
4. 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]
5. PM10 emissions from bin vent filters shall not exceed 0.015 lb/ton of powder conveyed into silo. [District Rules 2201, 4201, and 4202]
6. Permittee shall maintain a daily record of the quantity of dry powder conveyed into this silo and the total daily throughput of silos S-1203-10 and S-1203-11. Records shall be kept for a period of five years and made available for District inspection upon request. [District Rule 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-12-1 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
26,162 GALLON (3,500 CU. FT.) WHEY POWDER STORAGE SILO "C" WITH BIN VENT, 3 HP POWDER SILO BIN DISCHARGER, 2 HP BIN VENT EXHAUST FAN, AND 1 HP CONVEY-THRU ROTARY AIRLOCK

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. PM10 emissions from bin vent filters shall not exceed 0.015 lb/ton of powder conveyed into silo. [District Rules 2201, 4201, and 4202]
4. Maximum quantity of dried whey powder conveyed into silo shall not exceed 55 tons/day. [District Rules 2201 and 4202]
5. Permittee shall maintain a daily record of the quantity of dry powder conveyed into the silo. Records shall be kept for a period of five years and made available for District inspection upon request. [District Rule 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-13-0 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
AVAPAC BULK BAG FILLING SYSTEM INCLUDING MODEL C-63-00 BULK BAG FILLING MACHINE, 350 CUBIC FOOT SURGE HOPPER WITH NUCON BIN VENT SERVED BY A MODEL NCRD 102-100-3T DUST COLLECTOR SHARED WITH S-1203-14 AND S-1203-15

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The maximum daily whey products processed by this Avapac Bulk Bag filling system shall not exceed 280 ton/day. [District Rule 2201]
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
5. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101]
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
7. The baghouse shall be equipped with a 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 NSR Rule]
8. PM10 emissions shall not exceed 0.004 lb/ton of product. [District Rule 2201]
9. Permittee shall maintain accurate records of daily whey production. Records shall be made readily available for District inspection upon request for a period of 5 years. [District Rule 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-14-0 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
AVAPAC CAROUSEL BAG FILLING SYSTEM SERVED BY DUST COLLECTOR SYSTEM LISTED WITH S-1203-13

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The maximum daily whey products processed by this Avapac Carousel bagging system shall not exceed 280 ton/day. [District Rule 2201]
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
5. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101]
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
7. The baghouse shall be equipped with a 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 NSR Rule]
8. PM10 emissions shall not exceed 0.004 lb/ton of product. [District Rule 2201]
9. Permittee shall maintain accurate records of daily whey production. Records shall be made readily available for District inspection upon request for a period of 5 years. [District Rule 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-15-0 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
AVAPAC INLINE BAG FILLING SYSTEM INCLUDING 350 CUBIC FOOT POWDER SURGE HOPPER SERVED BY DUST COLLECTOR LISTED WITH S-1203-13

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The maximum daily whey products processed by this Avapac Inline bagging system shall not exceed 280 ton/day. [District Rule 2201]
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
5. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101]
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
7. The baghouse shall be equipped with a 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 NSR Rule]
8. PM10 emissions shall not exceed 0.004 lb/ton of product. [District Rule 2201]
9. Permittee shall maintain accurate records of daily whey production. Records shall be made readily available for District inspection upon request for a period of 5 years. [District Rule 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-16-3 **EXPIRATION DATE:** 01/31/2016

EQUIPMENT DESCRIPTION:
99 MMBTU/HR UNION IRON WORKS MODEL MH NATURAL GAS/PROPANE-FIRED FORCED DRAFT BOILER WITH VARIABLE FREQUENCY DRIVE BLOWER, TODD RAPID MIX BURNER, AND FLUE GAS RECIRCULATION

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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. The boiler shall only be fired on PUC regulated natural gas or propane. [District Rule 2201]
6. Emission rates from natural gas or propane firing shall not exceed any of the following: 7 ppmvd-NOx @ 3% O2 or 0.0085 lb-NOx/MMBtu, 0.008 lb-PM10/MMBtu, 0.006 lb-VOC/MMBtu, 0.017 lb-SOx (as SO2)/MMBtu, or 50 ppmvd-CO @ 3% O2. [District Rules 2201, 4305, 4306 and 4320]
7. The combined annual emissions from permit units S-1203-16, S-1203-20, and S-1203-22 shall not exceed any of the following limits: 15,611 lb-NOx; 16,343 lb-SOx; 11,132 lb-PM10; 64,649 lb-CO; or 8,238 lb-VOC. [District Rule 2201]
8. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201]
9. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 Rules 4305, 4306 and 4320]
10. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% 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 Rules 4305, 4306 and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable 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 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 performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
12. 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 Rules 4305, 4306 and 4320]
13. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate during District inspection that the combusted gas is provided from a commercial propane source. [District Rule 4320]
14. Source test to demonstrate compliance with NOx and CO emission limits while firing on propane shall be conducted within 60 days of the initial propane firing. [District Rules 1081 and 2201]
15. 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 4306. [District Rules 4305, 4306 and 4320]
16. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320]
17. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
18. 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]
19. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]
20. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
21. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306]
22. 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 Rules 4305, 4306 and 4320]
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
24. Permittee shall keep an ongoing record of the combined emissions for permit unit S-1203-16, S-1203-20, and S-1203-22 for each calendar year. The record shall be updated at least monthly. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. 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, 4306 and 4320]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-17-1 **EXPIRATION DATE:** 01/31/2016

EQUIPMENT DESCRIPTION:
113 BHP FORD MODEL WSG1068 NATURAL GAS/LPG-FIRED RICH BURN EMERGENCY STANDBY IC ENGINE WITH PCV, "EMIT" 3 WAY NSCR AND AUTOMATIC AIR/FUEL RATIO CONTROLLER, POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
2. This engine shall be equipped with an operational non-selective catalyst installed on the exhaust stack. [District Rule 2201]
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 2201 and 4702]
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. This engine shall only be fired on PUC quality natural gas, LPG, or propane. [District Rule 2201]
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
8. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
9. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rules 2201 and 4702]
10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
11. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
12. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
13. 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]
14. Emissions from this engine shall not exceed any of the following limits: 1.0 g-NOx/hp-hr, 0.0094 g-SOx/hp-hr, 0.0329 g-PM10/hp-hr, 3.73 g-CO/hp-hr, or 0.50 g-VOC/hp-hr. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]

16. 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 Rule 4702]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-20-3 **EXPIRATION DATE:** 01/31/2016

SECTION: SW14 **TOWNSHIP:** 20S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
63 MMBTU/HR NEBRASKA MODEL NOS-2-525 NATURAL GAS-FIRED BOILER EQUIPPED WITH ALZETA ULTRA LO-NOX BURNER MODEL CSB30-3SO-30/30/EC

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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd-NOx @ 3% O2 or 0.0085 lb-NOx/MMBtu, 0.0029 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 80 ppmvd-CO @ 3% O2, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
7. The combined annual emissions from permit units S-1203-16, S-1203-20, and S-1203-22 shall not exceed any of the following limits: 15,611 lb-NOx; 16,343 lb-SOx; 11,132 lb-PM10; 64,649 lb-CO; or 8,238 lb-VOC. [District Rule 2201]
8. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201]
9. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 Rules 4305, 4306 and 4320]
10. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable 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 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 performing the notification and testing required by this condition [District Rules 4305, 4306 and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. 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 Rules 4305, 4306 and 4320]
12. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% 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 Rules 4305, 4306 and 4320]
13. 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 4306. [District Rules 4305, 4306 and 4320]
14. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate during District inspection that the combusted gas is provided from a commercial propane source. [District Rule 4320]
15. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320]
16. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
17. 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]
18. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]
19. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
20. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
21. 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 Rules 4305, 4306 and 4320]
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
23. Permittee shall keep an ongoing record of the combined emissions for permit unit S-1203-16, S-1203-20, and S-1203-22 for each calendar year. The record shall be updated at least monthly. [District Rule 2201]
24. 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, 4306 and 4320]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-21-0 **EXPIRATION DATE:** 01/31/2016

EQUIPMENT DESCRIPTION:
STEAM-HEATED LACTOSE DRYER SERVED BY TWO MULLBERRY HILL C&E BAGHOUSES, EQUIPPED WITH A LACTOSE MILL SERVED BY ONE MULLBERRY HILL C&E BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The lactose dryer and lactose mill shall not operate for more than 7,965 hours per year, each. [District Rule 2201]
3. Airflow rate from the baghouses serving the lactose dryer shall not exceed 15,000 dscfm each. Airflow rate from the baghouse serving the lactose mill shall not exceed 12,000 dscfm. [District Rule 2201]
4. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
7. The baghouse shall be equipped with a 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]
8. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
9. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201]
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
11. Emissions from the baghouses shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
12. Emissions from the exhaust of the baghouses serving the lactose dryer and lactose mill shall not exceed 0.002 gr/dscf. [District Rule 2201]
13. Permittee shall record the daily and annual hours of operation of the lactose dryer and lactose mill. [District Rule 2201]
14. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201]
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-22-0 **EXPIRATION DATE:** 01/31/2016

EQUIPMENT DESCRIPTION:
90 MMBTU/HR NEBRASKA MODEL NS E 655 NATURAL GAS-FIRED BOILER WITH A JOHN ZINK TODD LOW NOX BURNER, FLUE GAS RECIRCULATION, AND A URS CORPORATION SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
3. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]
4. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
5. 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]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
7. Except during startup, emissions from the natural gas-fired boiler shall not exceed any of the following limits: 5 ppmvd-NOx @ 3% O2 or 0.0061 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmvd-CO @ 3% O2 or 0.037 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320]
8. During startup, emissions from the natural gas-fired boiler shall not exceed 30 ppmvd-NOx @ 3% O2 or 0.036 lb-NOx/MMBtu. [District Rule 2201]
9. The ammonia (NH3) emissions from the exhaust of the SCR system serving this boiler shall not exceed 10 ppmvd @ 3% O2. [District Rules 2201 and 4102]
10. The combined annual emissions from permit units S-1203-16, S-1203-20, and S-1203-22 shall not exceed any of the following limits: 15,611 lb-NOx; 16,343 lb-SOx; 11,132 lb-PM10; 64,649 lb-CO; or 8,238 lb-VOC. [District Rule 2201]
11. Duration of start-up shall not exceed either of the following: 2 hours per occurrence or 4 hours per day. During start-up, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306, and 4320]
12. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rule 4306 and Rule 4320]
13. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 Rules 4305, 4306 and 4320]

15. The permittee shall monitor and record the stack concentration of NH3 at least once during each month in which a source test is not performed. NH3 monitoring shall be conducted utilizing District approved gas-detection tubes or a District approved equivalent method. 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 one day of restarting the unit unless monitoring has been performed within the last month. [District Rule 4102]

16. NH3 emission readings shall be conducted at the time the NOx, CO, and O2 readings are taken. The NH3 readings shall be converted to ppmvd and corrected to 3% O2. [District Rule 4102]

17. If the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, or the NH3 concentrations corrected to 3% O2, as measured by District approved gas-detection tubes, 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 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 Rules 4102, 4305, 4306, and 4320]

18. All NOx, CO, O2, and NH3 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 NOx, CO, and O2 analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. NH3 emission readings shall be measured in accordance with the gas sample tube manufacturer's specifications and recommendations. 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 Rules 4102, 4305, 4306, and 4320]

19. 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 4306. [District Rules 4305 and 4306]

20. Source testing to measure NOx, CO, and NH3 emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4102, 4305, 4306, and 4320]

21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]

22. 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]

23. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]

24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
26. Source testing for ammonia emissions shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 2201]
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 Rules 4305, 4306 and 4320]
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
29. Permittee shall submit notification to the District of the date of construction, anticipated startup, and actual startup. Notifications shall be postmarked no later than 30 days after construction and 15 days after actual startup. The notifications shall include the design heat input and identification of fuels for this permit unit. [40 CFR 60.48c(a)]
30. The permittee shall maintain records of: (1) the date and time of NOx, CO, O2 and NH3 measurements, (2) the O2 concentration in percent and the measured NOx, CO, and NH3 concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4102, 4305, 4306, and 4320]
31. Permittee shall record monthly fuel consumption. [District Rule 4001 and 40 CFR 60.48c(g)]
32. Daily records of startup durations and number of occurences of each shall be maintained. [District Rules 2201, 4306, and 4320]
33. Permittee shall keep an ongoing record of the combined emissions for permit unit S-1203-16, S-1203-20, and S-1203-22 for each calendar year. The record shall be updated at least monthly. [District Rule 2201]
34. 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 and 40 CFR 60.48c(i)]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1203-23-0 **EXPIRATION DATE:** 01/31/2016

EQUIPMENT DESCRIPTION:
3500 CU FT LACTOSE POWDER SILO WITH BIN VENT FILTER (RECEIVING PRODUCT FROM THE KASON VIBROSCREEN SIFTER)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The bin vent filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
3. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule]
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
5. Airflow rate from the bin vent filter serving the lactose storage silo shall not exceed 1,250 dscfm. [District Rule 2201]
6. The lactose storage silo shall not be loaded for more than 7,965 hours per year, each. [District Rule 2201]
7. Replacement bags numbering at least 10% of the total number of bags in the bin vent filter shall be maintained on the premises. [District Rule 2201]
8. Emissions from the bin vent filter shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
10. Emissions from the exhaust of the bin vent filter serving the lactose storage silo shall not exceed 0.002 gr/dscf. [District Rule 2201]
11. Records of all maintenance of the bin vent filter, including all change outs of filter media, shall be maintained. [District Rule 2201]
12. Permittee shall record the daily and annual hours of loading of the lactose storage silo. [District Rule 2201]
13. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]