



JUN 02 2015

Robert Case
Cargill Meat Solutions Corporation
2350 Academy Avenue
Sanger, CA 93657

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: C-8855
Project Number: C-1150934

Dear Mr. Case:

Enclosed for your review and comment is the District's analysis of Cargill Meat Solutions Corporation's application for an Authority to Construct for the installation of six dehydrated pet treat manufacturing operations, each consisting of one 2.5 MMBtu/hr natural gas fired oven, located at 2350 Academy Avenue, Sanger, CA.

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 period, the District intends to issue the Authority to Construct. 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 regarding this matter, please contact Mr. Dustin Brown of Permit Services at (559) 230-5932.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM:ddb

Enclosures

cc: Mike Tollstrup, CARB (w/ enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review

Installation of a Six Dehydrated Pet Treat Manufacturing Operations

Facility Name:	Cargill Meat Solutions Corporation	Date:	June 2, 2015
Mailing Address:	2350 Academy Avenue Sanger, CA 93657-9559	Engineer:	Dustin Brown
Contact Person:	Robert Case	Lead Engineer:	Joven Refuerzo
Telephone:	(559) 573-3448		
Application #(s):	C-8855-1-0, '-2-0, '-3-0, '-4-0, '-5-0 and '-6-0		
Project #:	C-1150934		
Deemed Complete:	May 22, 2015		

I. Proposal

Cargill Meat Solutions has requested six Authority to Construct (ATC) permits for the installation of six dehydrated pet treat manufacturing operations each consisting of a 2.5 MMBtu/hr natural gas fired oven. The six new ovens will be replacing six existing permit exempt 0.5 MMBtu/hr natural gas fired space heating units. Since the existing units that are being replaced are currently exempt from permitting requirements, they will not be addressed within the application review for this project.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4104 Reduction of Animal Matter (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4301 Fuel Burning Equipment (12/17/92)
Rule 4309 Dryers, Dehydrators and Ovens (12/15/05)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The facility is located at 2350 Academy Avenue in Sanger, CA. The District has verified that the equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Cargill Meat Solutions manufactures all natural pet products made from high quality raw animal materials at this location. Hooves, bones, tendons, and other parts of livestock are used to create dried pet chew toys, mostly for canines.

The raw materials are placed on racks or in large metal crates which will be placed inside one of the six large walk-in ovens. The animal materials are heated to 175 - 225 °F to dehydrate the materials by removing moisture. Depending on the product being processed, the materials will stay in the new ovens for up to 60 hours (2.5 days). Once drying is complete, the material is collected and packaged for retail delivery.

The operating schedule of this facility is 24 hr/day, 7 days/week, and 52 weeks/year.

V. Equipment Listing

- C-8855-1-0:** DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER
- C-8855-2-0:** DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER
- C-8855-3-0:** DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER
- C-8855-4-0:** DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER
- C-8855-5-0:** DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER
- C-8855-6-0:** DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER

VI. Emission Control Technology Evaluation

The ovens are equipped with low NO_x burners. Low NO_x burners reduce NO_x by accomplishing the combustion process in stages. Staging partially delays the combustion process, resulting in a cooler flame which suppresses thermal NO_x formation. The two most common types of low NO_x burners being applied to natural gas-fired boilers are staged air burners and staged fuel burners. NO_x emission reductions of 40 to 85 percent (relative to uncontrolled emission levels) have been observed with low NO_x burners.

VII. General Calculations

A. Assumptions

- The maximum operating schedule for each oven is 24 hours/day and 365 days/year (worst case, proposed by the applicant)
- The ovens are fired on PUC-regulated natural gas only
- Natural Gas Heating Value: 1,000 Btu/scf (District Practice)
- F-Factor for Natural Gas: 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B)

B. Emission Factors

Pre-Project Emission Factors

Since this is a new emissions unit, EF1 for all pollutants = 0.

Post-Project Emission Factors

Pollutant	Post-Project Emission Factors		Source
NO _x	0.036 lb-NO _x /MMBtu	30 ppmv NO _x (@ 3%O ₂)	Burner Supplier/ Applicant
SO _x	0.00285 lb-SO _x /MMBtu		District Policy APR 1720
PM ₁₀	0.0076 lb-PM ₁₀ /MMBtu		AP-42 (07/98) Table 1.4-2
CO	0.296 lb-CO/MMBtu	400 ppmv CO (@ 3%O ₂)	Burner Supplier/ Applicant
VOC	0.0055 lb-VOC/MMBtu		AP-42 (07/98) Table 1.4-2

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Since these ovens are all new emissions units, PE1 = 0 for all criteria pollutants for the unit.

2. Post Project Potential to Emit (PE2)

Daily PE (PE2):

Each oven has the potential to burn natural gas for an entire day. Therefore, the NO_x, CO, VOC, PM₁₀ and SO_x daily PE values will be calculated using the emission factors listed above, the heat input rating of the burner and the maximum hours of operation during any given day.

$$PE \text{ (lb/day)} = EF \text{ (lb/MMBtu)} \times \text{Burner Rating (MMBtu/hr)} \times 24 \text{ (hr/day)}$$

Pollutant	Emission Factor (lb/MMBtu)	Burner Rating (MMBtu/hr)	Operating Hours (hr/day)	PE (lb/day)
NO _x	0.036	2.5	24	2.2
SO _x	0.00285	2.5	24	0.2
PM ₁₀	0.0076	2.5	24	0.5
CO	0.296	2.5	24	17.8
VOC	0.0055	2.5	24	0.3

Annual PE2:

The applicant is not proposing to include an annual operating limit for these ovens as a part of this project. Therefore, the NO_x, CO, VOC, PM₁₀ and SO_x annual PE values will be calculated using the emission factors listed above, the heat input rating of the burner and the maximum hours of operation during any given year.

$$PE \text{ (lb/year)} = EF \text{ (lb/MMBtu)} \times \text{Burner Rating (MMBtu/hr)} \times 8,760 \text{ (hr/year)}$$

Pollutant	Emission Factor (lb/MMBtu)	Burner Rating (MMBtu/hr)	Operating Hours (hr/year)	PE (lb/year)
NO _x	0.036	2.5	8,760	788
SO _x	0.00285	2.5	8,760	62
PM ₁₀	0.0076	2.5	8,760	166
CO	0.296	2.5	8,760	6,482
VOC	0.0055	2.5	8,760	120

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Since this is a new facility, there are no valid ATCs, PTOs, or ERCs at the Stationary Source; therefore, the SSPE1 is equal to zero.

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The Post-Project Stationary Source Potential to Emit (SSPE2) is summarized in the following table.

Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit's	NO _x	SO _x	PM ₁₀	CO	VOC
C-8855-1-0	788	62	166	6,482	120
C-8855-2-0	788	62	166	6,482	120
C-8855-3-0	788	62	166	6,482	120
C-8855-4-0	788	62	166	6,482	120
C-8855-5-0	788	62	166	6,482	120
C-8855-6-0	788	62	166	6,482	120
Post Project SSPE2	4,728	372	996	38,892	720

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site."

Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Pre-Project SSPE (SSPE1)	0	0	0	0	0
Post Project SSPE (SSPE2)	4,728	372	996	38,892	720
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No

As seen in the table above, the facility is not an existing Major Source and also is not becoming a Major Source as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)						
	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀
Estimated Facility PE before Project Increase	0	0	0	0	0	0
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ?	No	No	No	No	No	No

As shown above, the facility is not an existing major source for PSD for at least one pollutant. Therefore the facility is not an existing major source for PSD.

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22

Since the proposed units are new emissions units, BE = PE1 = 0 for all criteria pollutants for each unit.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is not a major source for any of the pollutants addressed in this project, this project does not constitute an SB 288 major modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this facility is not a Major Source for any pollutant, this project does not constitute a Federal Major Modification. Additionally, since the facility is not a major source for PM₁₀ (140,000 lb/year), it is not a major source for PM_{2.5} (200,000 lb/year).

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀
- Greenhouse gases (GHG): CO₂, N₂O, CH₄, HFCs, PFCs, and SF₆

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

In the case the facility is new source, the second step of the PSD evaluation is to determine if this new facility will become a new PSD major Source as a result of the project and if so, to determine which pollutant will result in a PSD significant increase.

I. Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from New and Modified Units	0.4	0.1	0.2	19.4	0.5	0.5
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	No	No	No	No	No	No

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Attachment E.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT shall be required for the following actions:*

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As seen in Section VII.C.2 of this evaluation, the applicant is proposing to install six new natural gas-fired ovens each with a PE greater than 2.0 lb/day for NO_x and CO emissions. BACT is triggered for NO_x emissions only since the PE's are greater than 2 lbs/day; however BACT is not triggered for CO since the SSPE2 for CO is not greater than 200,000 lbs/year, as demonstrated in Section VII.C.5 of this document.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

As discussed in Section I above, there are no modified emissions units associated with this project; therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.7 above, this project does not constitute a SB 288 and/or Federal Major Modification for NO_x emissions; therefore BACT is not triggered for any pollutant.

2. BACT Guideline

Per District Policy APR 1305, Section IX, "A top-down BACT analysis shall be performed as a part of the Application Review for each application subject to the BACT requirements pursuant to the District's NSR Rule." For source categories or classes covered in the BACT Clearinghouse, relevant information under each of the steps may be simply cited from the Clearinghouse without further analysis.

The District's current BACT Clearinghouse Guideline 1.6.17, applies to food preparation ovens with a maximum heat input rating of 3.7 MMBtu/hr operating at a temperature of less than 800 °F. Pursuant to information supplied by Cargill for this project, the pet treats manufactured and dehydrated at this facility are subject to the same quality standards as food that is cooked in ovens and prepared for human consumption. Therefore, BACT Guideline 1.6.17 applies to the proposed pet product ovens (BACT Guideline 1.6.17 included in Attachment A) and no further discussion is required.

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached Top-Down BACT Analysis (see **Attachment A**), BACT has been satisfied with the following:

NO_x: Natural gas fired burner (30 ppmv @ 3% O₂)

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

Offset Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Post Project SSPE (SSPE2)	13,483	372	996	38,892	720
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	No

2. Quantity of Offsets Required

As seen above, the SSPE2 is not greater than the offset thresholds for all the pollutants; therefore offset calculations are not necessary and offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

- New Major Sources, Federal Major Modifications, and SB288 Major Modifications,
- Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- Any project which results in the offset thresholds being surpassed, and/or
- Any project with an SSPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Modifications, and SB288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. As shown in Section VII.C.5 above, the SSPE2 is not greater than the Major Source threshold for any pollutant. Therefore, public noticing is not required for this project for new Major Source purposes.

As demonstrated in Sections VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

c. Offset Threshold

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	0	4,728	20,000 lb/year	No
SO _x	0	372	54,750 lb/year	No
PM ₁₀	0	996	29,200 lb/year	No
CO	0	38,892	200,000 lb/year	No
VOC	0	720	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	4,728	0	4,728	20,000 lb/year	No
SO _x	372	0	372	20,000 lb/year	No
PM ₁₀	996	0	996	20,000 lb/year	No
CO	38,892	0	38,892	20,000 lb/year	Yes
VOC	720	0	720	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, public noticing is required for this project for an SSIPE in CO emissions in excess of 20,000 lb/year. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions for each Permit Unit:

- The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
- Emissions shall not exceed any of the following limits: 30 ppmvd NO_x @ 3% O₂ or 0.036 lb-NO_x/MMBtu; 0.00285 lb-SO_x/MMBtu; 0.0076 lb-PM₁₀/MMBtu, 400 ppmvd CO @ 3% O₂ or 0.296 lb-CO/MMBtu; or 0.0055 lb-VOC/MMBtu. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

No recordkeeping is required to demonstrate compliance with Rule 2201.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

An AAQA shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. The District's Technical Services Division conducted the required analysis. Refer to **Attachment B** of this document for the AAQA summary sheet.

The proposed location is in an attainment area for NO_x, CO, and SO_x. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for NO_x, CO, or SO_x.

The proposed location is in a non-attainment area for the state's PM₁₀ as well as federal and state PM_{2.5} thresholds. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for PM₁₀ and PM_{2.5}.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

Since this facility's potential emissions do not exceed any major source thresholds of Rule 2201, this facility is not a major source, and Rule 2520 does not apply.

Rule 4001 New Source Performance Standards

This rule incorporates NSPS from Subpart 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Subpart 60. However, no chapters of 40 CFR Subpart 60 apply to natural gas-fired dehydrated pet treat ovens.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Subpart 61 or 40 CFR Subpart 63. However, no subparts of 40 CFR Subpart 61 or 40 CFR Subpart 63 apply to natural gas-fired dehydrated pet treat ovens.

Rule 4101 Visible Emissions

District Rule 4101, Section 5.0, indicates that 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.

The following condition will assure continued compliance:

- 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]

Therefore, compliance with District Rule 4101 requirements is expected.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations provided the equipment is well maintained. Therefore, compliance with this rule is expected.

Air contaminants released into the atmosphere, which cause a public nuisance, are not expected.

The following conditions will be included on the new ATC's to assure these operations do not cause a nuisance:

- No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]
- The facility, associated equipment, and surrounding Cargill Meat Solutions property shall be operated and maintained in such a manner as to prevent the generation of odors which may constitute a nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than or equal to one. According to the Technical Services Memo for this project (Attachment B), the total facility prioritization score including this project was less than or equal to one. Therefore, no future analysis is required to determine the impact from this project and compliance with the District's Risk Management Policy is expected.

District Rule 4104 Reduction of Animal Matter

The purpose of this rule is to limit air contaminants from source operations used for the reduction of animal matter. Pursuant to research performed by the District as a part of this project and summarized in the memo included in Attachment C, the original intent of this rule was to apply only to rendering plants.

Cargill Meat Solutions is only removing moisture from raw animal materials to produce pet treats. They are not performing any type of reduction or rendering processes at this facility. Therefore, Rule 4104 is not applicable to the proposed pet treat dehydration ovens.

Rule 4201 Particulate Matter Concentration

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

F-Factor for Natural Gas: 8,710 dscf/MMBtu at 68 °F, equivalent to

$$\text{Corrected } F - \text{ factor} = \left(\frac{8,710 \text{ dscf}}{\text{MMBtu}} \right) \times \left(\frac{60^\circ F + 459.6}{68^\circ F + 459.6} \right) = 8,578 \frac{\text{dscf}}{\text{MMBtu}} \text{ at } 60^\circ F$$

PM ₁₀ Emission Factor:	0.0076 lb-PM ₁₀ /MMBtu
Percentage of PM as PM ₁₀ in Exhaust:	100%
Exhaust Oxygen (O ₂) Concentration:	3%
Excess Air Correction to F Factor =	$\frac{20.9}{(20.9 - 3)} = 1.17$

$$GL = \left(\frac{0.0076 \text{ lb} - \text{PM}}{\text{MMBtu}} \times \frac{7,000 \text{ grain}}{\text{lb} - \text{PM}} \right) / \left(\frac{8,578 \text{ ft}^3}{\text{MMBtu}} \times 1.17 \right)$$

$$GL = 0.0053 \text{ grain/dscf} < 0.1 \text{ grain/dscf}$$

Therefore, compliance with District Rule 4201 requirements is expected. The following condition will assure continued compliance with the requirements of this rule:

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

District Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO₂, NO₂, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from LPG/natural gas combustion are less than 1 μm in diameter.

District Rule 4301 Limits			
Pollutant	NO ₂	Total PM	SO ₂
C-8855-1-0 (lb/hr)	0.09	0.019	0.007
C-8855-2-0 (lb/hr)	0.09	0.019	0.007
C-8855-3-0 (lb/hr)	0.09	0.019	0.007
C-8855-4-0 (lb/hr)	0.09	0.019	0.007
C-8855-5-0 (lb/hr)	0.09	0.019	0.007
C-8855-6-0 (lb/hr)	0.09	0.019	0.007
Rule Limit (lb/hr)	140	10	200

The above table indicates compliance with the maximum lb/hr emissions in this rule; therefore, continued compliance is expected.

District Rule 4309 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 or greater. As discussed above, Cargill Meat Solutions is proposing to install six pet treat ovens, each with a maximum heat input rating of 2.5 MMBtu/hr. Therefore, this rule does not apply to the proposed ovens.

District Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO₂, on a dry basis averaged over 15 consecutive minutes.

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

$$\text{Volume SO}_2 = \frac{n RT}{P}$$

With:

N = moles SO₂

T (Standard Temperature) = 60°F = 520°R

P (Standard Pressure) = 14.7 psi

$$R \text{ (Universal Gas Constant)} = \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$$

EPA F-Factor for Natural Gas: 8,710 dscf/MMBtu at 68 °F, equivalent to

$$\text{Corrected F - factor} = \left(\frac{8,710 \text{ dscf}}{\text{MMBtu}} \right) \times \left(\frac{60^\circ \text{F} + 459.6}{68^\circ \text{F} + 459.6} \right) = 8,578 \frac{\text{dscf}}{\text{MMBtu}} \text{ at } 60^\circ \text{F}$$

Natural Gas Combustion:

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

$$\text{Sulfur Concentration} = 1.97 \frac{\text{parts}}{\text{million}} < 2,000 \text{ ppmv (or 0.2\%)}$$

Therefore, compliance with District Rule 4801 requirements is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has prepared or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

On December 17, 2009, the District's Governing Board adopted a policy, APR 2005, *Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*, for addressing GHG emission impacts when the District is Lead Agency under CEQA and approved the District's guidance document for use by other agencies when addressing GHG impacts as lead agencies under CEQA. Under this policy, the District's determination of significance of project-specific GHG emissions is founded on the principal that projects with GHG emission reductions consistent with AB 32 emission reduction targets are considered to have a less than significant impact on global climate change. Consistent with District Policy 2005, projects complying with an approved GHG emission reduction plan or GHG mitigation program, which avoids or substantially reduces GHG emissions within the geographic area in which the project is located, would be determined to have a less than significant individual and cumulative impact for GHG emission.

The California Air Resources Board (ARB) adopted a Cap-and-Trade regulation as part one of the strategies identified for AB 32. This Cap-and-Trade regulation is a statewide plan, supported by a CEQA compliant environmental review document, aimed at reducing or mitigating GHG emissions from targeted industries. Facilities subject to the Cap-and-Trade regulation are subject to an industry-wide cap on overall GHG emissions. Any growth in emissions must be accounted for under that cap such that a corresponding and equivalent reduction in emissions must occur to allow any increase. Further, the cap decreases over time, resulting in an overall decrease in GHG emissions.

Under District policy APR 2025, *CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation*, the District finds that the Cap-and-Trade is a regulation plan approved by ARB, consistent with AB32 emission reduction targets, and supported by a CEQA compliant environmental review document. As such, consistent with District Policy 2005, projects complying project complying with Cap-and-Trade requirements are determined to have a less than significant individual and cumulative impact for GHG emissions.

The GHG emissions increases associated with this project result from the combustion of fossil fuel(s), other than jet fuel, delivered from suppliers subject to the Cap-and-Trade regulation. Therefore, as discussed above, consistent with District Policies APR 2005 and APR 2025, the District concludes that the GHG emissions increases associated with this project would have a less than significant individual and cumulative impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the

District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct permit C-1551-10-0 subject to the permit conditions on the attached draft Authority to Construct in Attachment F.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-8855-1-0	3020-02-F	2.5 MMBtu/hr Oven	\$607.00
C-8855-2-0	3020-02-F	2.5 MMBtu/hr Oven	\$607.00
C-8855-3-0	3020-02-F	2.5 MMBtu/hr Oven	\$607.00
C-8855-4-0	3020-02-F	2.5 MMBtu/hr Oven	\$607.00
C-8855-5-0	3020-02-F	2.5 MMBtu/hr Oven	\$607.00
C-8855-6-0	3020-02-F	2.5 MMBtu/hr Oven	\$607.00

Attachments

- A: BACT Guideline 1.6.17 and Top Down BACT Analysis for NO_x Emissions
- B: HRA and AAQA Summaries
- C: Applicability of Rule 4104 Determination
- D: Quarterly Net Emission Change Calculations
- E: Draft ATC's and Emissions Profiles

ATTACHMENT A

**BACT Guideline 1.6.17 and Top Down
BACT Analysis for NO_x Emissions**

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 1.6.17*

Last Update: 7/10/1998

Food Preparation Oven, <800 degrees Fahrenheit, = or < 3.7 MMBtu/hr

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
NOx	Natural Gas-Fired burner (83-30 ppmv @ 3 ppmv O2)	1. Ultra Low-NOx Burner (<10 ppmv @ 3 ppmv O2) 2. Low-NOx Burner (10-30 ppmv @ 3 ppmv O2)	Electric Heater

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

Top Down BACT Analysis for each Oven

1. BACT Analysis for NO_x Emissions:

a. Step 1 - Identify all control technologies

SJVUAPCD BACT Clearinghouse Guideline 1.6.17 identifies achieved-in-practice BACT as a natural gas fired burner with NO_x emissions of 83-30 ppmv @ 3% O₂.

SJVAPCD BACT Clearinghouse Guideline 1.6.17 identifies technologically feasible BACT as the following:

- Ultra low NO_x burner with NO_x emissions of less than 10 ppmv @ 3% O₂
- Low NO_x burner with NO_x emissions ranging between 10 to 30 ppmv @ 3% O₂

SJVACPCD BACT Clearinghouse Guideline 1.6.17 identifies alternate basic equipment BACT as an electric oven.

b. Step 2 - Eliminate technologically infeasible options

There are no technologically infeasible options to eliminate from step 1.

c. Step 3 - Rank remaining options by control effectiveness

- 1) Electric Oven
- 2) Ultra low NO_x burner with NO_x emissions of less than 10 ppmv @ 3% O₂
- 3) Low NO_x burner with NO_x emissions ranging between 10 to 30 ppmv @ 3% O₂
- 4) Natural gas fired burner with NO_x emissions ranging between 30 to 83 ppmv @ 3% O₂

d. Step 4 - Cost Effectiveness Analysis

Electric Heater:

Per District policy APR 1305, Best Available Control Technology (BACT), Section IX E1, technologically feasible control alternatives and cost effective control that is more effective than the achieved-in-practice option shall not be required for a small emitter. A small emitter shall be required to use the most effective control technology or equipment that has been achieved-in-practice, including achieved-in-practice alternate basic equipment and process for new equipment.

A small emitter is defined as a stationary source with an annual, post project potential to emit of less than two tons per year of each criteria pollutant or maximum daily emissions below the following levels:

Pollutant	Small Emitter Threshold (lb/day)
NO _x	40
CO	220
VOC	30
PM ₁₀	30
SO _x	30

The maximum daily emissions from this facility are summarized in the table below:

Permit Unit	NO _x (lb/day)	SO _x (lb/day)	PM ₁₀ (lb/day)	CO (lb/day)	VOC (lb/day)
C-8855-1	2.2	0.2	0.5	17.8	0.3
C-8855-2	2.2	0.2	0.5	17.8	0.3
C-8855-3	2.2	0.2	0.5	17.8	0.3
C-8855-4	2.2	0.2	0.5	17.8	0.3
C-8855-5	2.2	0.2	0.5	17.8	0.3
C-8855-6	2.2	0.2	0.5	17.8	0.3
Total	13.2	1.2	3.0	106.8	1.8
Small Emitter Threshold	40.0	30.0	30.0	220.0	30.0
Small Emitter	Yes	Yes	Yes	Yes	Yes

As a part of this project, the District performed a search for other facilities that manufacture pet treats from raw animal materials. No facilities were found that utilize an electric oven for drying purposes. Therefore, an electric oven has not been determined to be achieved-in-practice for this class and category of operation. Therefore, since the facility meets the definition of a small emitter, the alternate basic equipment control alternative of an electric oven is not required. Therefore, this control technology is being removed from consideration at this time.

Ultra Low NO_x Burner (NO_x less than 10 ppmv @ 3% O₂):

Per District policy APR 1305, Best Available Control Technology (BACT), Section IX E1, technologically feasible control alternatives shall not be required for a small emitter. As shown above, this facility can be classified as a small emitter. Therefore, the technologically feasible control alternative of an ultra low burner with NO_x emissions of less than 10 ppmv @ 3% O₂ is not required. Therefore, this control technology is being removed from consideration at this time.

Low NO_x Burner (NO_x Ranging Between 10-30 ppmv @ 3% O₂):

As shown above, Cargill is proposing to install six natural gas fired ovens with NO_x emissions of 30 ppmv @ 3% O₂. As the applicant is proposing to utilize this control option, a cost effectiveness analysis is not required.

Natural Gas Fired Burner (NO_x Ranging Between 30-83 ppmv @ 3% O₂):

As shown above, Cargill is proposing to install six natural gas fired ovens with NO_x emissions of 30 ppmv @ 3% O₂. As the applicant is proposing to utilize a control option that is equivalent or more effective than this option, no additional analysis is required for this option.

e. Step 5 - Select BACT

The applicant is proposing six natural gas fired ovens with NO_x emissions of 30 ppmv @ 3% O₂. As the applicant is proposing the most effective control technology remaining from step 3 above, BACT requirements for NO_x emissions are met.

ATTACHMENT B

HRA and AAQA Summaries

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Dustin Brown – Permit Services
 From: Kyle Melching – Technical Services
 Date: June 1, 2015
 Facility Name: Cargill Meat Solutions
 Location: 2350 Academy Ave., Sanger
 Application #(s): C-8855-1-0 thru 6-0
 Project #: C-1150934

A. RMR SUMMARY

RMR Summary			
Categories	Six 2.58 MMBTU/HR NG Ovens (Units 1-0 through 6-0)	Project Totals	Facility Totals
Prioritization Score	0.11*	0.11	<1
Acute Hazard Index	N/A	N/A	N/A
Chronic Hazard Index	N/A	N/A	N/A
Maximum Individual Cancer Risk	N/A	N/A	N/A
T-BACT Required?	No		
Special Permit Conditions?	No		

*The project passed on prioritization with a score less than 1; therefore, no further analysis was required.

I. Project Description

Technical Services received a request on May 21, 2015, to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) to install six new 2.5 MMBtu/hr natural gas fired ovens to be used to dehydrate pet treats.

II. Analysis

Toxic emissions for this proposed unit were calculated using 2001 Ventura County's Air Pollution Control District's emission factors for Natural Gas Fired external combustion. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905-1, March 2, 2001), risks from the project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEART's database. The prioritization score for the project was less than 1.0 (see RMR Summary Table); therefore, no further evaluation is required.

The following parameters were used for the review:

Analysis Parameters (Units 1-0 thru 6-0)			
Project NG Usage (mmscf/hr)	0.15	Closest Receptor (m)	77
Project 1-0 NG Usage (mmscf/yr)	131.4	Type of Receptor	Business
Source Type	Area	Release Height (m)	11.28
Length of Side (m)	41	Length of Side (m)	50

Technical Services also performed modeling for criteria pollutants CO, NO_x, SO_x, & PM₁₀. Emission rates used for criteria pollutant modeling were 4.44 lb/hr and 38,894 lb.yr CO, 0.54 lb/hr and 4,730 lb/yr NO_x, 0.06 lb/hr and 556 lb/yr SO_x, and 0.12 lb/hr and 1,051 lb/yr PM₁₀. The project was modeled an elevated area source; therefore, the SIL's from fugitive sources were used as the PM10 standards for the AAQA.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*
Values are in µg/m³

NG-Ovens	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	Pass	X	Pass	X	X
NO _x	Pass ¹	X	X	X	Pass
SO _x	Pass	Pass	X	Pass	Pass
PM ₁₀	X	X	X	Pass ²	Pass ²
PM _{2.5}	X	X	X	Pass ²	Pass ²

*Results were taken from the attached PSD spreadsheet.

¹The project was compared to the 1-hour NO₂ National Ambient Air Quality Standard that became effective on April 12, 2010, using the District's approved procedures.

²The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

III. Conclusion

The criteria modeling runs indicate the emissions from the proposed equipment will not cause or significantly contribute to a violation of a State or National AAQS.

The prioritization score for this project is not above 1.0. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

IV. Attachments

- A. RMR request from the project engineer
- B. Additional information from the applicant/project engineer
- C. Prioritization score w/ toxic emissions summary
- D. Facility Summary
- E. AAQA Summary

ATTACHMENT C

Applicability of Rule 4104 Determination

SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT

OFFICE MEMO

DATE: May 21, 2015

TO: Permit Services Staff

FROM: Dustin Brown / Arnaud Marjollet

SUBJECT: Applicability of Rule 4104, Reduction of Animal Matter, to Pet Food/Treat Manufacturing Operations

Proposal:

Cargill Meat Solutions Corporation (FID C-8855) is proposing to install six new natural gas fired ovens for the manufacturing of dehydrated pet treats. Raw animal materials such as hooves, ears and bones are placed in the ovens to dry out the materials. Once drying is completed, the material is collected and packaged for retail delivery.

Purpose:

District Rule 4104 currently states that the purpose of the rule is to limit air contaminants from source operations used for the reduction of animal matter. The purpose of this memo is to establish guidance on the applicability of this rule to pet food manufacturing operations that receive raw animal materials (meats, bones, hooves, ears, etc) and dehydrate them to produce pet food or treats.

Background:

District Rule 4104, Sections 2.0 (Applicability) states that this rule shall apply to any source operation used for the reduction of animal matter. Section 3.1 defines the term reduction as any heated process, including rendering, cooking, drying, dehydration, digesting, evaporating and protein concentrating.

The District originally adopted district Rule 4104 on May 21, 1992. The original staff report from when the rule was adopted stated that the rule was similar to rules that were already in place within the eight counties that made up the District. Therefore, requirements from older county rules were used as the basis for the current requirements of District Rule 4104. For instance, Fresno County Rule 414, Reduction of Animal Matter, dated June 1986, listed the same requirements as the current District Rule 4104 above.

Analysis:

Six other major air districts in California were found to have Reduction of Animal Matter prohibitory rules (see Attached table). Four of the six rules had similar or identical definitions of the term “reduction” as defined in District Rule 4104.

However, Bay Area Air Quality Management District’s regulation 12, Rule 2 states that the rule applies to plants whose purpose is the reduction of animal matter, commonly referred to as rendering plants. In addition, Monterey Bay APCD Rule 414 states that it applies to all rendering plants operating within the Air District.

Rendering is a heating process for meat industry waste products through which fats are separated from water and protein residues for the production of edible lards and dried protein residues. All of the rendering processes involve the application of heat, the extraction of moisture, and the separation of fat. Commonly rendering includes the production of meat meal, bone meal and fat from animal tissues. Cooking is generally accomplished with steam at temperatures of 240 °F to 290 °F for 40 to 90 minutes depending upon the type of system and raw materials processed.

In addition, the District also currently has one permitted facility that was found to operate a similar process as the proposed Cargill Meat Solutions process: KDR Pet Treats, LLC (FID C-8436). When the facility was permitted, the District did not subject their ovens to Rule 4104. One additional facility was found that operates a similar process in Perris, CA, Cal Premium Treats. This facility has two permits for boilers with South Coast AQMD and it was determined that the facility was not subjected to Rule 472 at the time of permit issuance.

Recommendation:

Based upon the analysis above and the applicability and definitions taken from Bay Area AQMD Regulation 12, Rule 2 and Monterey Bay APCD Rule 414, it appears the primary purpose or intent of all of these Reduction of Animal Matter prohibitory rules is to control air contaminants from rendering plants, and that the definition of “reduction” should be read to be analogous to “rendering”.

Cargill Meat Solutions is only removing moisture from raw animal materials to produce pet treats. Their ovens operate at a maximum temperature of 200 °F and the products remain in the ovens for an average time of 36 hours (times vary depending on the specific product being processed). The products being processed in the ovens are not being reduced from one form to another. Therefore, they are not performing any type of reduction or rendering processes at this facility and Rule 4104 is not applicable to the proposed pet treat dehydration ovens.

District	Rule	Title	Applicability/Definitions	Original Adoption Date
San Joaquin Valley APCD	4104	Reduction of Animal Matter	Reduction is any heated process, including rendering, cooking, drying, dehydration, digesting, evaporating and protein concentrating.	5/21/1992
South Coast AQMD	472	Reduction of Animal Matter	Reduction of animal matter means any heated process, used for rendering, cooking, drying, dehydrating, digesting, evaporating and protein concentrating.	5/7/1976
Bay Area AQMD	Regulation 12, Rule 2	Rendering Plants	Applies to plants whose purpose is the reduction of animal matter, commonly referred to as rendering plants.	N/A
Ventura County APCD	58	Reduction of Animal Matter	Reduction of animal matter means processing animal matter by any process, including rendering, cooking, drying, dehydration, digestion, evaporation and protein concentrating.	10/22/1968
San Diego APCD	64	Reduction of Animal Matter	Reduction is any heated process used for rendering, cooking, drying, dehydrating, digesting, evaporating and protein concentrating.	8/21/1981
Monterey Bay APCD	414	Reduction of Animal Matter	Applies to all rendering plants operating within the Air District.	9/1/1974
Sacramento Metropolitan AQMD	410	Reduction of Animal Matter	Reduction is any heated process, including rendering, cooking, drying, dehydrating, digesting, evaporating and protein concentrating.	5/15/1972

ATTACHMENT D

Quarterly Net Emissions Change Calculations

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

$QNEC = PE2 - BE$, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.

PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.

BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/qtr.

Since this is a new unit, the BE can be set equal to zero for all pollutants. Therefore, the NEC can be calculated by taking the annual post project potential to emit values (PE2) and dividing by four quarters per year.

Quarterly NEC [QNEC] for Each Unit			
	Annual PE2 (lb/year)	Quarters	NEC (lb/qtr)
NO _x	788	4	197
SO _x	62	4	16
PM ₁₀	166	4	42
CO	6,482	4	1,621
VOC	120	4	30

ATTACHMENT E

Draft ATC's and Emissions Profiles

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-8855-1-0

LEGAL OWNER OR OPERATOR: CARGILL MEAT SOLUTIONS CORPORATION
MAILING ADDRESS: 2350 ACADEMY AVENUE
SANGER, CA 93657

LOCATION: 2350 ACADEMY AVENUE
SANGER, CA 93657

EQUIPMENT DESCRIPTION:

DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {15} 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. The facility, associated equipment, and surrounding Cargill Meat Solutions property shall be operated and maintained in such a manner as to prevent the generation of odors which may constitute a nuisance. [District Rule 4102]
4. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {2964} The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. Emissions shall not exceed any of the following limits: 30 ppmvd NOx @ 3% O2 or 0.036 lb-NOX/MMBtu; 0.00285 lb-SOx/MMBtu; 0.0076 lb-PM10/MMBtu, 400 ppmvd CO @ 3% O2 or 0.296 lb-CO/MMBtu; or 0.0055 lb-VOC/MMBtu. [District Rule 2201]

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

C-8855-1-0 - May 28 2015 10:54AM -- BROWND - Joint Inspection NOT Required

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-8855-2-0

LEGAL OWNER OR OPERATOR: CARGILL MEAT SOLUTIONS CORPORATION
MAILING ADDRESS: 2350 ACADEMY AVENUE
SANGER, CA 93657

LOCATION: 2350 ACADEMY AVENUE
SANGER, CA 93657

EQUIPMENT DESCRIPTION:

DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {15} 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. The facility, associated equipment, and surrounding Cargill Meat Solutions property shall be operated and maintained in such a manner as to prevent the generation of odors which may constitute a nuisance. [District Rule 4102]
4. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {2964} The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. Emissions shall not exceed any of the following limits: 30 ppmvd NOx @ 3% O2 or 0.036 lb-NOX/MMBtu; 0.00285 lb-SOx/MMBtu; 0.0076 lb-PM10/MMBtu, 400 ppmvd CO @ 3% O2 or 0.296 lb-CO/MMBtu; or 0.0055 lb-VOC/MMBtu. [District Rule 2201]

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

C-8855-2-0 May 28 2015 11:38AM -- BROWND : Joint Inspection NOT Required

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-8855-3-0

LEGAL OWNER OR OPERATOR: CARGILL MEAT SOLUTIONS CORPORATION
MAILING ADDRESS: 2350 ACADEMY AVENUE
SANGER, CA 93657

LOCATION: 2350 ACADEMY AVENUE
SANGER, CA 93657

EQUIPMENT DESCRIPTION:

DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {15} 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]
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Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

C-8855-3-0 : May 28 2015 11:38AM -- BROWND - Joint Inspection NOT Required

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-8855-4-0

LEGAL OWNER OR OPERATOR: CARGILL MEAT SOLUTIONS CORPORATION
MAILING ADDRESS: 2350 ACADEMY AVENUE
SANGER, CA 93657

LOCATION: 2350 ACADEMY AVENUE
SANGER, CA 93657

EQUIPMENT DESCRIPTION:
DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {15} 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]
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5. {2964} The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
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Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

C-8855-4-0 ; May 28 2015 11:38AM -- BROWND : Joint Inspection NOT Required

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

DRAFT

PERMIT NO: C-8855-5-0

LEGAL OWNER OR OPERATOR: CARGILL MEAT SOLUTIONS CORPORATION

MAILING ADDRESS: 2350 ACADEMY AVENUE
SANGER, CA 93657

LOCATION: 2350 ACADEMY AVENUE
SANGER, CA 93657

EQUIPMENT DESCRIPTION:

DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER

CONDITIONS

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5. {2964} The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
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Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjolle, Director of Permit Services

C-8855-5-0 : May 28 2015 11:38AM -- BROWND : Joint Inspection NOT Required

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

DRAFT

PERMIT NO: C-8855-6-0

LEGAL OWNER OR OPERATOR: CARGILL MEAT SOLUTIONS CORPORATION
MAILING ADDRESS: 2350 ACADEMY AVENUE
SANGER, CA 93657

LOCATION: 2350 ACADEMY AVENUE
SANGER, CA 93657

EQUIPMENT DESCRIPTION:

DEHYDRATED PET TREAT MANUFACTURING OPERATION CONSISTING OF ONE 2.5 MMBTU/HR ALKAR NATURAL GAS FIRED OVEN WITH A MAXON, MODEL OPLE 25, BURNER

CONDITIONS

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Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

C-8855-6-0 : May 28 2015 11:38AM -- BROWND : Joint Inspection NOT Required

Permit #: C-8855-1-0	Last Updated
Facility: CARGILL MEAT SOLUTIONS CORPORATION	05/25/2015 BROWND

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	788.0	62.0	166.0	6482.0	120.0
Daily Emis. Limit (lb/Day)	2.2	0.2	0.5	17.8	0.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	197.0	15.0	41.0	1620.0	30.0
Q2:	197.0	15.0	41.0	1620.0	30.0
Q3:	197.0	16.0	42.0	1621.0	30.0
Q4:	197.0	16.0	42.0	1621.0	30.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: C-8855-2-0	Last Updated
Facility: CARGILL MEAT SOLUTIONS CORPORATION	05/25/2015 BROWND

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	788.0	62.0	166.0	6482.0	120.0
Daily Emis. Limit (lb/Day)	2.2	0.2	0.5	17.8	0.3
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Q3:	197.0	16.0	42.0	1621.0	30.0
Q4:	197.0	16.0	42.0	1621.0	30.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: C-8855-3-0	Last Updated
Facility: CARGILL MEAT SOLUTIONS CORPORATION	05/25/2015 BROWND

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	788.0	62.0	166.0	6482.0	120.0
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Q4:	197.0	16.0	42.0	1621.0	30.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: C-8855-4-0	Last Updated
Facility: CARGILL MEAT SOLUTIONS CORPORATION	05/25/2015 BROWND

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	788.0	62.0	166.0	6482.0	120.0
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Q4:	197.0	16.0	42.0	1621.0	30.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: C-8855-5-0	Last Updated
Facility: CARGILL MEAT SOLUTIONS CORPORATION	05/25/2015 BROWND

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	788.0	62.0	166.0	6482.0	120.0
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Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: C-8855-6-0	Last Updated
Facility: CARGILL MEAT SOLUTIONS CORPORATION	05/25/2015 BROWND

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
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