

JUL 29 2016

Jerrett Hollis  
Perfection Pet Foods, LLC  
PO Box 1029  
Goshen, CA 93227

**Re: Notice of Preliminary Decision - Authority to Construct**  
**Facility Number: S-8001**  
**Project Number: S-1162655**

Dear Mr. Hollis:

Enclosed for your review and comment is the District's analysis of Perfection Pet Foods, LLC's application for an Authority to Construct for dryer modifications, at 1111 N Miller Park Court, Visalia, 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. Richard Edgehill of Permit Services at (661) 392-5617.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

AM:rue

Enclosures

cc: Tung Le, CARB (w/ enclosure) via email

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
4800 Enterprise Way  
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**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
**Pet Food Manufacturing Operation**

Facility Name:	Perfection Pet Foods, LLC	Date:	July 14, 2016
Mailing Address:	PO Box 1029 Goshen, CA 93227	Engineer:	Richard Edgehill
Contact Person:	Jerrett Hollis	Lead Engineer:	Richard Karrs
Telephone:	559-302-4871		
E-Mail:	<a href="mailto:jhollis@perfectionpetfoods.com">jhollis@perfectionpetfoods.com</a>		
Application #(s):	S-8001-3-2		
Project #:	S-1162655		
Deemed Complete:	July 11, 2014		

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## **I. Proposal**

Perfection Pet Foods (PPF) has requested an Authority to Construct (ATC) permit for the modification of the existing manufacturing operation (S-8001-3) by increasing the CO limit of three (3) natural gas fired dryer coolers from 5.13 ppm @ 19% O<sub>2</sub> to 20 ppm @ 19% O<sub>2</sub>.

The increase in CO emissions triggers Public Notice. BACT and offsets are not required.

### Disposition of Outstanding ATCs

ATC S-8001-3-1 has been implemented and serves as the base document. ATC S-8001-3-1 and current PTO S-8001-3-0 are included in **Attachment I**.

Facility S-8001 is not a Major Source and therefore Rules 2520 and 2530 are not applicable.

## **II. Applicable Rules**

Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
Rule 2410	Prevention of Significant Deterioration (11/26/12)
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 4201	Particulate Matter Concentration (12/17/92)
Rule 4202	Particulate Matter - Emission Rate (12/17/92)
Rule 4309	Dryers, Dehydrators, and Ovens (Adopted December 15, 2005)
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 dog food production operation is located at 1111 N. Miller Park Court., Visalia, CA. The operation is not be located within 1,000 feet of the outer boundary of a K-12 school as shown in the location map included in **Attachment II**.

### IV. Process Description

The pet food manufacturing facility receives raw materials by truck including grains, minerals and meat products which are loaded into storage bins and tanks.

Ingredients from the storage bins are fed into weigh hoppers and then routed to the mixer surge bin. Once the ingredients have been mixed they are routed to a grinding operation with grinders and hammer mills vented to fabric collectors. The mixed ingredients are then be conveyed back to one of the 3,000 ft<sup>3</sup> storage bins or to one of the 1,500 ft<sup>3</sup> intermediate storage bins which feed the extrusion lines.

From the intermediate storage bins the ingredients pass through a set of scalping decks and then into the extruders which blend the mix, heat the product to a specified temperature as a pasteurization step and form the product into the desired shape. The wet product is then routed through a dryer to bring the moisture content down to the desired level. The finished product is then coated with the desired flavoring (fats & oils) and stored in bulk product storage bins.

Finished product is routed from the product bulk storage bins to the packaging lines where it is loaded into retail or bulk packaging as requested by the customer. Some product will be sent to the bulk load-out system for delivery to end users.

#### Proposed Modification

Attempts at tuning the S-8001-3 dryers has documented unstable operation at the current CO emission limit and the inability of the units to then operate in compliance with their NO<sub>x</sub> emission limit. To allow greater operational flexibility when operating the dryers, applicant has requested an increase in CO limit to 20 ppmv @ 19% O<sub>2</sub>. There will be no changes to NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or VOC emissions limits.

### V. Equipment Listing

#### Pre-Project Equipment Description:

S-8001-3-1: MODIFICATION OF 300 HP EXTRU-TECH MODEL E750 EXTRUDER DISCHARGING TO AN 8 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1042-2P-AFII DRYER COOLER, 400 HP EXTRU-TECH MODEL E950 EXTRUDER DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED

EXTRU-TECH MODEL 1063-2P-AFII DRYER COOLER, PRODUCT COATING, CONVEYORS, ELEVATORS, AUGERS, AND TURN HEADS: ADD A THIRD PRODUCTION LINE CONSISTING OF A PERMIT EXEMPT SURGE BIN, 400 HP EXTRU-TECH MODEL E950 EXTRUDER DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1063-2P-AFII DRYER COOLER, AND ADDITIONAL CONVEYORS, ELEVATORS AND AUGERS

1 300 HP E 750 HP EXTRUDER  
2 400 HP E950 EXTRUDERS  
1 X 8 MMBTU/HR EXTRU-TECH MODEL 1042-2P-AFII DRYER COOLER  
2 X 12 MMBTU/HR EXTRU-TECH MODEL 1063-2P-AFII DRYER COOLER  
DRYERS

Proposed Modification:

S-8001-3-2: MODIFICATION OF 300 HP EXTRU-TECH MODEL E750 EXTRUDER DISCHARGING TO AN 8 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1042-2P-AFII DRYER COOLER, TWO 400 HP EXTRU-TECH MODEL E950 EXTRUDER EACH DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1063-2P-AFII DRYER COOLER, PRODUCT COATING, CONVEYORS, ELEVATORS, AUGERS, AND TURN HEADS : INCREASE CO LIMIT OF DRYER COOLERS TO 20 PPMV @ 19% O<sub>2</sub>

Post Project Equipment Description:

S-8001-3-2: 300 HP EXTRU-TECH MODEL E750 EXTRUDER DISCHARGING TO AN 8 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1042-2P-AFII DRYER COOLER, TWO 400 HP EXTRU-TECH MODEL E950 EXTRUDER EACH DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1063-2P-AFII DRYER COOLER, PRODUCT COATING, CONVEYORS, ELEVATORS, AUGERS, AND TURN HEADS

## VI. Emission Control Technology Evaluation

The existing dryers are equipped with Low-NO<sub>x</sub> burners capable of achieving NO<sub>x</sub> emissions of < 30 ppmv @ 3% O<sub>2</sub> during normal operation. This burner represents technologically feasible control technology for this type of equipment as required by BACT Guideline 1.6.2; therefore, additional design review is not required for this process.

## VII. General Calculations

- The facility and all permitted equipment is designed to operate 24 hours/day, 365 days/yr (per Applicant)
- No PM<sub>10</sub> emissions are emitted from the process equipment as material moisture content is >10% (District Practice)
- Throughputs are not expected to exceed the following (per Applicant):

Device	Throughput (ton/hour)
E750 Extruder	7
E950 Extruder	12 (each of 2)
Total	31 tons/hr

- The proposed boilers and dryers will be fired exclusively on PUC quality natural gas (per Applicant)
- Natural gas HHV = 1,000 Btu/scf (APR 1720)
- Natural gas F-Factor = 8,578 dscf/MMBtu (corrected to 60 °F)
- Natural gas sulfur content = 1 grain/100scf (0.00285 lbSOx/MMBtu)

## B. Emission Factors

### Pre-Project

Dryer Emission Factors			
	lb/MMBtu		Source
NO <sub>x</sub>	0.024	2.12 ppmv @ 19% O <sub>2</sub> 0.024 lb-NO <sub>x</sub> /MMBtu	Current Permit
SO <sub>x</sub>	0.00285	1 gr-S/dscf	District Policy APR-1720
PM <sub>10</sub>	0.0076		Current Permit
CO	0.037	5.31 ppmv @ 19% O <sub>2</sub> 0.037 lb-CO/MMBtu	Current Permit
VOC	0.0055		Current Permit

### Post-Project

The previously approved dryers are expected to operate in compliance with the following emissions factors.

Dryer Emission Factors			
	lb/MM Btu	ppmv	Source
NO <sub>x</sub>	0.024	2.12 ppmv @ 19% O <sub>2</sub>	PTO S-8001-3-1
SO <sub>x</sub>	0.00285		PTO S-8001-3-1
PM <sub>10</sub>	0.0076		PTO S-8001-3-1
CO	0.1392*	20 ppmv @ 19% O <sub>2</sub>	ATC S-8001-3-2PTO S-8001-3-1
VOC	0.0055		PTO S-8001-3-1

\*District calculator

### C. Calculations

#### 1. Pre-Project Potential to Emit (PE1)

The pre-project manufacturing operation is comprised of two 12 MMBtu/hr natural gas-fired dryers rated and one 8 MMBtu/hr dryer (total 32 MMBtu/hr) with identical emission factors.

Pollutant	Daily PE1			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE1 (lb/day)
NO <sub>x</sub>	0.024	32	24	18.4
SO <sub>x</sub>	0.00285	32	24	2.2
PM <sub>10</sub>	0.0076	32	24	5.8
CO	0.037	32	24	28.4
VOC	0.0055	32	24	4.2

Pollutant	Annual PE1			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE1 (lb/year)
NO <sub>x</sub>	0.024	32	8,760	6,728
SO <sub>x</sub>	0.00285	32	8,760	799
PM <sub>10</sub>	0.0076	32	8,760	2,130
CO	0.037	32	8,760	10,372
VOC	0.0055	32	8,760	1,542

## 2. Post Project Potential to Emit (PE2)

- PE2 = EF (lb/MMBtu) × Heat Input (MMBtu/hr) × Op. Sched. (hr/day or hr/year)

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO <sub>x</sub>	0.024	32	24	18.4
SO <sub>x</sub>	0.00285	32	24	2.2
PM <sub>10</sub>	0.0076	32	24	5.8
CO	0.139	32	24	106.9
VOC	0.0055	32	24	4.2

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
NO <sub>x</sub>	0.024	32	8,760	6,728
SO <sub>x</sub>	0.00285	32	8,760	799
PM <sub>10</sub>	0.0076	32	8,760	2,130
CO	0.139	32	8,760	39,021
VOC	0.0055	32	8,760	1,542

Emissions profiles are included in **Attachment II**.

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

Pursuant to Section 4.9 of District Rule 2201, SSPE1 is the PE from all units with valid Authorities to Construct (ATCs) or Permits to Operate (PTOs) at the Stationary Source and the quantity of emission reduction credits (ERCs) 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. PPF does not hold any ERC's for this facility.

SSPE1 is SSPE2 for project 1142101 (ATC S-8001-3-1)

Pre Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-8001-1-1	0	0	219	0	0
S-8001-2-1	0	0	475	0	0
S-8001-3-1	6,728	799	2,130	10,372	1,542
S-8001-4-1	0	0	240	0	0
S-8001-5-0	938	315	839	4,084	607
S-8001-6-0	938	315	839	4,084	607
S-8001-7-0	0	0	37	0	0
Pre Project (SSPE1)	8,604	1,429	4,779	18,540	2,756

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

Pursuant to Section 4.10 of District Rule 2201, SSPE2 is the PE from all units with valid Authorities to Construct (ATCs) or Permits to Operate (PTOs) at the Stationary Source and the quantity of emission reduction credits (ERCs) 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. PPF does not hold any ERC's for this facility.

The SSPE2 for this facility is tabulated below in the following table:

Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-8001-1-1	0	0	219	0	0
S-8001-2-1	0	0	475	0	0
S-8001-3-2	6,728	799	2,130	39,021	1,542
S-8001-4-1	0	0	240	0	0
S-8001-5-0	938	315	839	4,084	607
S-8001-6-0	938	315	839	4,084	607
S-8001-7-0	0	0	37	0	0
Post Project (SSPE2)	8,604	1,429	4,779	47,189	2,756

#### 5. Major Source Determination

##### Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165



Rule 2201 Major Source Determination (lb/year)						
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	VOC
SSPE1	8,604	1,429	4,779	4,779	18,540	2,756
SSPE2	8,604	1,429	4,779	4,779	47,189	2,756
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No	No

Note: PM2.5 assumed to be equal to PM10

As seen in the table above, the facility is not an existing Major Source and 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)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Estimated Facility PE before Project Increase	4.3	1.4	0.7	9.3	2.4	2.4
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown above, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

**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 pollutants, this project does not constitute a Federal Major Modification.

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

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10
- Sulfuric acid mist
- Hydrogen sulfide (H2S)
- Total reduced sulfur (including H2S)
- Reduced sulfur compounds

**I. Project Emissions Increase - New Major Source Determination**

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

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.

<b>PSD Major Source Determination: Potential to Emit (tons/year)</b>						
	<b>NO2</b>	<b>VOC</b>	<b>SO2</b>	<b>CO</b>	<b>PM</b>	<b>PM10</b>
Total PE from New and Modified Units	3.4	0.8	0.4	20	1.1	1.1
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

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

### 10. Quarterly Net Emissions Change (QNEC)

QNEC is used to complete the emission profile screen for the District's PAS database. The QNEC for each pollutant is shown in the table(s) below and recorded in the PAS database emissions profile.

The QNEC shall be calculated as follows:

$$\text{QNEC} = (\text{PE2} - \text{BE})/4$$

QNEC (lb/qtr) – Dryer Lines (S-8001-3)					
Pollutant	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
PE2 (lb/yr)	6728	799	2,130	39,021	1,542
BE (lb/yr)	6728	799	2,130	10,372	1,542
QNEC	0	0	0	7162.25	0

### 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 specifically exempted by Rule 2201, 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 SB 288 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 discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

**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**

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE2} - (\text{PE1} * (\text{EF2} / \text{EF1}))$$

NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, VOC

$$\text{PE1} = \text{PE2}, \text{EF1} = \text{EF2}, \text{AIPE} = 0$$

CO

$$\text{EF2}/\text{EF1} = 1$$

$$\begin{aligned} \text{AIPE} &= \text{PE2} - \text{PE1} \\ &= 106.9 - 28.4 \\ &= 78.5 \text{ lb/day} \end{aligned}$$

As demonstrated above, the AIPE is greater than 2.0 lb/day for CO. However BACT is not triggered for CO since the SSPE2 for CO is not greater than 200,000 lb/year, as demonstrated in Section VII.C.5 above.

**d. SB 288/Federal Major Modification**

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 and/or Federal Major Modification for NO<sub>x</sub> emissions. Therefore BACT is not triggered for any pollutant.

**B. Offsets**

**1. Offset Applicability**

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE2	8,604	1,429	4,779	47,189	2,756
Offset Thresholds	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:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.
- e. Any project which results in a Title V significant permit modification

**a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications**

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, 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. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

**c. Offset Threshold**

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO <sub>x</sub>	8,604	8,604	20,000 lb/year	No
SO <sub>x</sub>	1,429	1,429	54,750 lb/year	No
PM <sub>10</sub>	4,779	4,779	29,200 lb/year	No
CO	18,540	47,189	200,000 lb/year	No
VOC	2,756	2,756	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 <sub>x</sub>	8,604	8,604	0	20,000 lb/year	No
SO <sub>x</sub>	1,429	1,429	0	20,000 lb/year	No
PM <sub>10</sub>	4,779	4,779	0	20,000 lb/year	No
CO	47,189	18,540	28,649	20,000 lb/year	No
VOC	2,756	2,756	0	20,000 lb/year	No

As demonstrated above, the SSIPE for CO is greater than 20,000 lb/year; therefore public noticing for SSIPE purposes is required.

### **e. Title V Significant Permit Modification**

Since this facility does not have a Title V operating permit, this change is not a Title V significant Modification, and therefore public noticing is not required.

### **2. Public Notice Action**

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

### **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.

The applicable DELs for the extrusion line are as follows.

*Emissions from the natural gas-fired unit shall not exceed any of the following limits: 2.12 ppmvd NOx @ 19% O2 (equivalent to 0.024 lb-NOx/MMBtu), 0.0076 lb-PM10/MMBtu, 20 ppmvd CO @ 19% O2 (equivalent to 0.1392 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O2 concentration is greater than 19%, the corrected NOx or CO concentration is equal to the measured NOx or CO concentration. [District Rules 2201, 4201, 4301, and 4309] N*

### **E. Compliance Assurance**

#### **1. Source Testing**

The dryer is subject to District Rule 4309, *Dryers, Dehydrators and Ovens*. The source testing requirements, in accordance with this rule, also satisfy the source testing requirements for Rule 2201 and will be discussed in Section VIII of this evaluation. No additional source testing is required.

#### **2. Monitoring**

The dryer is subject to District Rule 4309, *Dryers, Dehydrators and Ovens*. Monitoring requirements, in accordance with this rule, also satisfies the monitoring requirements for Rule 2201 and will be discussed in Section VIII of this evaluation. No additional monitoring is required.

### **3. Recordkeeping**

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition(s) will appear on the permit to operate:

The dryer is subject to District Rule 4309, *Dryers, Dehydrators and Ovens*. Recordkeeping requirements, in accordance with this rule also satisfy the recordkeeping requirements for Rule 2201 and will be discussed in Section VIII of this evaluation. No additional recordkeeping is required.

### **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 III** of this document for the AAQA summary sheet.

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

#### **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 (NSPS)**

This rule incorporates NSPS from Part 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 Part 60. However, no subparts of 40 CFR Part 60 apply to dryer/coolers in this project.

#### **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 Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to the dryers/coolers in this project.

#### **Rule 4101 Visible Emissions**

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity).



As the dryers are all fired solely on natural gas, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Furthermore, all post extrusion particulate emissions in this process are negligible due to the high moisture content of the material being handled. The following condition will be placed on the permit:

- *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]*

### **Rule 4102 Nuisance**

Rule 4102 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.

### **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.

As demonstrated above, there are no increases in HAP emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

### **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 NG:	8,578 dscf/MMBtu at 60 °F
PM <sub>10</sub> Emission Factor:	0.0076 lb-PM10/MMBtu
Percentage of PM as PM10 in Exhaust:	100%
Exhaust Oxygen (O <sub>2</sub> ) Concentration:	3%
Excess Air Correction to F Factor	$20.9 / (20.9 - 3) = 1.17$

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

$$GL = 0.005 \text{ grain/dscf} < 0.1 \text{ grain/dscf}$$

Therefore, compliance with District Rule 4201 requirements is expected.

### Rule 4202 Particulate Matter Emissions Rate

This rule establishes a maximum allowable particulate emission rate for a given maximum process rate. The proposed grinding operation will have a maximum process rate of 2,880 tons per day; therefore, the throughput for this calculation will be 120 tons per hour. For a process rate, P (tons/hour), the maximum allowable emission rate is E (lb-PM/hour), as determined by the following formula for P > 30 tons/ hr:

$$E = 17.31 * P^{0.16}$$

District Rule 4202 Limits			
	Process Rate, P (tons/hr)	Calculated Emission Limit, E (lb-PM/hr)	Proposed Limit (lb-PM <sub>10</sub> /hr)
S-8001-3-0	31	30	5.8 lb/day / 8 hr/day = 0.72

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

### Rule 4309 Dryers, Dehydrators, and Ovens

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) 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. Since the dryers being installed in this project have heat input ratings greater than 5.0 MMBtu, this dryers are subject to the requirements of this rule.

#### Section 5.0, Requirements

Section 5.0 states that all ppmv limits specified in this section are referenced at dry stack gas conditions and adjusted using an oxygen correction factor of 19% by volume.

Section 5.2 requires that except for dehydrators, NO<sub>x</sub> and CO emissions shall not exceed the limits specified in the table below on and after the full compliance schedules specified in Sections 7.1 and 7.3, as appropriate. All ppmv emission limits specified in this section are referenced at dry stack gas conditions and 19 percent by volume stack gas oxygen. Emission concentrations shall be corrected to 19 percent oxygen in accordance with Section 5.0.

NO <sub>x</sub> and CO Limits				
Process Description	NO <sub>x</sub> Limit (in ppmv)		CO Limit (in ppmv)	
	Gaseous Fuel Fired	Liquid Fuel Fired	Gaseous Fuel Fired	Liquid Fuel Fired
Asphalt/Concrete Plants	4.3	12.0	42	64
Milk, Cheese, and Dairy Processing < 20 MMBtu/hr	3.5	3.5	42	42

Milk, Cheese, and Dairy Processing $\geq$ 20 MMBtu/hr	5.3	5.3	42	42
Other processes not described above	4.3	4.3	42	42

The dryers in this project perform a process not specifically described; therefore they are subject to the requirements of the "Other processes not described above" listed in the table above.

For the dryers:

The proposed NO<sub>x</sub> emission factor is 2.12 ppmvd @ 19% O<sub>2</sub> (0.024 lb/MMBtu).  
The proposed CO emission factor is 20 ppmvd @ 19% O<sub>2</sub> (0.1392 lb/MMBtu).

Therefore, compliance with this section is expected.

A permit condition listing the emissions limits will be listed on the permit as shown in the DEL section above.

Section 5.3 states that the applicable emission limits in Section 5.2 shall not apply during start-up or shutdown provided an operator complies with the requirements specified below.

The facility has not requested relaxed emission limit requirements for these units during startup or shutdown, therefore this section does not apply to the unit in this project.

**Section 5.4, Monitoring Requirements**

Section 5.4.1 states that except for dehydrators, the operator of any unit subject to the applicable emission limits in Sections 4.3.2, or 5.2 shall monitor emissions using one of the techniques specified in Sections 5.4.1.1 or 5.4.1.2.

Section 5.4.1.1 states the first technique as the installation and maintenance of an APCO-approved CEMS for NO<sub>x</sub>, and oxygen that meets the following requirements.

- 40 CFR Part 51, and
- 40 CFR Parts 60.7 and 60.13 (except subsection h), and
- 40 CFR Part 60 Appendix B (Performance Specifications), and
- 40 CFR Part 60 Appendix F (Quality Assurance Procedures), and
- The applicable provisions of District Rule 1080 (Stack Monitoring).
- The APCO shall only approve CEMS that meets the requirements of Sections 5.4.1.1.1 through 5.4.1.1.5 of this rule.

Section 5.4.1.2 states the second technique as the installation and maintenance of an alternate emissions monitoring method that meets the requirements of Sections 5.4.1.2.1 through 5.4.1.2.3 of this rule.

Section 5.4.1.2.1 states that the APCO shall not approve an alternative monitoring system unless it is documented that continued operation within ranges of specified emissions-

related performance indicators or operational characteristics provides a reasonable assurance of compliance with applicable emission limits.

Section 5.4.1.2.2 states that the approved alternate emission monitoring system shall monitor operational characteristics necessary to assure compliance with the emission limit. Operational characteristics shall be one or more of the following:

- Periodic NO<sub>x</sub> exhaust emission concentrations,
- Periodic exhaust oxygen concentration,
- Flow rate of reducing agent added to exhaust,
- Catalyst inlet and exhaust temperature,
- Catalyst inlet and exhaust oxygen concentration,
- Periodic flue gas recirculation rate,
- Other surrogate operating parameter(s) that demonstrate compliance with the emission limit.

Since the operation of the units subject to this rule are very similar to the operation of the units subject to the requirements of District Rule 4306, *Boilers, Steam Generators, and Process Heaters – Phase 3*, the pre-approved alternate monitoring plans in District Policy SSP-1105 will be considered approved alternate monitoring plans for District Rule 4309 compliance.

In order to satisfy the requirements of District Rule 4309, the applicant has proposed to use pre-approved alternate monitoring scheme A (pursuant to District Policy SSP-1105), which requires that monitoring of NO<sub>x</sub>, CO, and O<sub>2</sub> exhaust concentrations shall be conducted at least once per month (in which a source test is not performed) using a portable analyzer. The following conditions will be incorporated into the permit in order to ensure compliance with the requirements of the proposed alternate monitoring plan:

- *{3741} The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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]*
- *{3742} If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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]*

- *{3743} 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]*
- *{3744} The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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]*

### **Section 5.5, Compliance Determination**

Section 5.5.1 states that all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the PTO.

Section 5.5.2 states that except for as provided in Section 5.5.3, 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.

The following condition will be added to the permit to assure compliance with Sections 5.5.1 and 5.5.2.

- *{3713} 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]*

Section 5.5.3 states that notwithstanding the requirements of Section 5.5.2, the APCO, ARB, and US EPA may approve a longer or shorter period before compliance determination, if an operator submits an application for a PTO condition which provides a justification for the requested duration.

Section 5.5.4 states that all CEMS emissions measurements shall be averaged over a period of 15 consecutive minutes to demonstrate compliance with the applicable emission limits of this rule. Any 15-consecutive-minute block average CEMS measurement exceeding the applicable emission limits of this rule shall constitute a violation of this rule.

The facility has not proposed to utilize a CEMS; therefore the requirements of this section are not applicable to the dryer in this project.

Section 5.5.5 states that for emissions monitoring pursuant to Section 5.4.1.2.2.1, emission readings 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.

The following condition will be added to the permit to assure compliance with this section.

- *{3713} 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]*

Section 5.5.6 states that for emissions source testing performed pursuant to Section 6.3.1 to determine compliance with an applicable emission limit of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the unit, even if the averaged emissions of all three test runs are less than the applicable limit. The following condition will be added to the permit to assure compliance with this section.

- *{3715} 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]*

### **Section 6.1, Recordkeeping**

Section 6.1.1 states the recordkeeping requirements of a unit that uses CEMS to monitor emissions. Since the applicant has not proposed a CEMS to monitor emissions, the requirements of this section do not apply to the unit in this project.

Section 6.1.2 states that operators using an alternate emissions monitoring system shall maintain the following records on a periodic basis:

- Total hours of operation.
- Type and quantity of fuel used during operations.
- Measurement for each surrogate parameter.
- Range of allowed values for each surrogate parameter.
- The period for recordkeeping shall be specified in the PTO conditions.

Section 6.1.3 only applies to dehydrators; therefore this section is not applicable to the unit in this project.

Section 6.1.4 states that the operator of a unit subject to Section 5.2 and performing start-up or shutdown of that unit shall keep records of the duration of each start-up and each shutdown.

The facility has not proposed start-up or shutdown emissions for the dryer in this operation; therefore the requirements of this section do not apply to the dryer in this project.

Section 6.1.5 states the recordkeeping requirements of an operator of any unit operated under the exemption of Section 4.3.

Since the applicant has not applied for the exemption in Section 4.3, the requirements in this section do not apply to the dryer in this project.

Section 6.1.6 states the records and manufacturer's specifications required by Sections 6.1.1 through 6.1.5 shall meet all of the following requirements.

- The records shall be maintained for five (5) calendar years,
- The records shall be made available on-site during normal business hours, and
- The records shall be submitted to the APCO upon request.

The following condition will be added to the permit to assure compliance with this section.

- *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, 2201, and 4309]*

### **Section 6.2, Test Methods**

Section 6.2 lists the test methods required by the rule. In lieu of the test methods listed below the facility can utilize alternative APCO and US EPA approved test methods.

Pollutant	Units	Test Method Required
Fuel hhv	Fuel hhv shall be certified by third party fuel supplier or:	
	Liquid fuels	ASTM D 240-87 or D 2382-88
	Gaseous fuels	ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89
NO <sub>x</sub>	ppmv	EPA Method 7E or ARB Method 100
CO	ppmv	EPA Method 10 or ARB Method 100
Stack Gas O <sub>2</sub>	%	EPA Method 3 or 3A, or ARB Method 100
Stack Gas Velocities	ft/min	EPA Method 2
Stack Gas Moisture Content	%	EPA Method 4

The following permit conditions will be listed on the permit as follows:

- *{3718} NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]*

- *{3719} CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]*
- *{3720} Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]*

Section 6.3.2 states that each unit subject to the requirements in Sections 4.3, or 5.2 shall be initially source tested to determine compliance with the applicable emission limits not later than the applicable full compliance schedule specified in Section 7.0. Thereafter, each unit subject to Section 5.2 emission limits shall be source tested at least once every 24 months. Units subject to Section 5.2 and operating less than 50 days per calendar year shall follow the source test frequency prescribed in Section 6.3.3. The following condition will be added to the permit to assure compliance with this section.

- *Source testing to measure NO<sub>x</sub> and CO emissions from this unit when fired on natural gas shall be conducted within 60 days of initial start-up and at least once every 24 months thereafter. [District Rules 2201 and 4309]*

Section 6.3.5 states that the APCO shall be notified according to the provisions of Rule 1081 (Source Sampling). The following conditions will be added to the permit to assure compliance with this section.

- *{109} 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]*
- *{3721} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]*

Section 6.3.6 states that emissions source testing shall be conducted with the unit operating either at conditions representative of normal operations or conditions specified in the PTO. The requirements of this section will be satisfied by the condition listed in Sections 5.5.1 and 5.5.2 of this rule evaluation.

Section 6.3.7 states that all test results for NO<sub>x</sub> and CO shall be reported in ppmv, corrected to dry stack conditions and adjusted using the oxygen correction factor. The following condition will be added to the permit to assure compliance with this section.

- *{3722} All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309]*

Section 6.3.8 states that for the purpose of determining compliance with an applicable emission limit, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply.

Section 6.3.9 states that if two of the three runs specified by Section 6.3.8 individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate



compliance for the unit, even if the averaged emissions of all three runs is less than the applicable limit.

The requirements of Sections 6.3.8 and 6.3.9 will be satisfied by the condition listed in Section 5.5.6 of this rule evaluation.

Section 6.4 lists the source testing requirements for asphalt/concrete plants. Since this facility is not an asphalt or concrete plant, the requirements of this section do not apply to the dryer in this project.

## **Conclusion**

Conditions will be incorporated into the permit in order to ensure compliance with each section of this rule, see attached draft permits in Appendix H. Therefore, compliance with District Rule 4309 requirements is expected.

## **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 SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes.

The dryers listed on permit S-8001-3 emit sulfur compounds and are limited to fire exclusively on PUC regulated natural gas that will ensure compliance with this rule. Therefore the following condition will be listed on the ATC to ensure compliance:

- *The unit shall only be fired on PUC regulated natural gas. [District Rules 2201, 4309, and 4801]*

## **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.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) do not trigger Best Available Control Technology (BACT) and do not trigger Toxic Best Available Control Technology (T-BACT) requirements.

Issuance of permits for emissions units not subject to BACT or T-BACT requirements is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

**Indemnification Agreement/Letter of Credit Determination**

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The proposed project requires only ministerial approval, and is exempt from the provisions of CEQA. As such, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

**IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Issue Authorities to Construct S-8001-3-2 subject to the permit conditions on the attached draft Authority to Construct in **Attachment IV**.

**X. Billing Information**

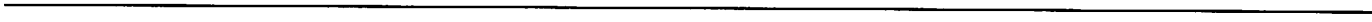
Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-8001-3-2	3020-02-H	32 MMBtu/hr	\$1128.00

**Attachments**

- Attachment I: Base Document ATC and Current PTO
- Attachment II: Emissions Profile
- Attachment III: AAQA
- Attachment IV: Draft ATC

**Attachment I**  
**Base Document ATC and Current PTO**

## Attachment II Emissions Profile



**Attachment III**  
**AAQA**



Attachment IV  
Draft ATC



**Attachment I**  
**Base Document ATC and Current PTO**



# AUTHORITY TO CONSTRUCT

PERMIT NO: S-8001-3-1

ISSUANCE DATE: 06/30/2014

LEGAL OWNER OR OPERATOR: PERFECTION PET FOODS, LLC  
MAILING ADDRESS: P.O. BOX 1029  
GOSHEN, CA 93227

LOCATION: 1111 N MILLER PARK COURT  
VISALIA, CA 93291

## EQUIPMENT DESCRIPTION:

MODIFICATION OF 300 HP EXTRU-TECH MODEL E750 EXTRUDER DISCHARGING TO AN 8 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1042-2P-AFII DRYER COOLER, 400 HP EXTRU-TECH MODEL E950 EXTRUDER DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1063-2P-AFII DRYER COOLER, PRODUCT COATING, CONVEYORS, ELEVATORS, AUGERS, AND TURN HEADS: ADD A THIRD PRODUCTION LINE CONSISTING OF A PERMIT EXEMPT SURGE BIN, 400 HP EXTRU-TECH MODEL E950 EXTRUDER DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1063-2P-AFII DRYER COOLER, AND ADDITIONAL CONVEYORS, ELEVATORS AND AUGERS

## CONDITIONS

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1. ATC S-8001-3-0 shall be implemented prior to or concurrent with this ATC. [District Rule 2201]
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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. The units shall only be fired on PUC regulated natural gas. [District Rules 2201, 4309, and 4801]
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 2.12 ppmvd NO<sub>x</sub> @ 19% O<sub>2</sub> (equivalent to 0.024 lb-NO<sub>x</sub>/MMBtu), 0.0076 lb-PM<sub>10</sub>/MMBtu, 5.31 ppmvd CO @ 19% O<sub>2</sub> (equivalent to 0.037 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O<sub>2</sub> concentration is greater than 19%, the corrected NO<sub>x</sub> or CO concentration is equal to the measured NO<sub>x</sub> or CO concentration. [District Rules 2201, 4201, 4301, and 4309]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

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Arnaud Marjollet, Director of Permit Services  
S-8001-3-1 : Jul 9 2010 11:44AM - EDGEMLR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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]
7. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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]
8. 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]
9. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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]
10. 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]
11. Source testing to measure NO<sub>x</sub> and CO emissions from this unit when fired on natural gas shall be conducted within 60 days of initial start-up and at least once every 24 months thereafter. [District Rules 2201 and 4309]
12. 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]
13. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
14. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
15. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
16. 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]
17. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
18. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309]
19. Permittee shall maintain records which demonstrate the units are fired exclusively on PUC quality natural gas. [District Rules 2201 and 4309]

CONDITIONS CONTINUE ON NEXT PAGE

20. 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, 2201, and 4309]

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8001-3-0

EXPIRATION DATE: 02/28/2017

## EQUIPMENT DESCRIPTION:

300 HP EXTRU-TECH MODEL E750 EXTRUDER DISCHARGING TO AN 8 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1042-2P-AFII DRYER COOLER, 400 HP EXTRU-TECH MODEL E925 EXTRUDER DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1852-AFII DRYER COOLER, PRODUCT COATING, CONVEYORS, ELEVATORS, AUGERS, AND TURN HEADS

## PERMIT UNIT REQUIREMENTS

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1. Specific fuel consumption shall not exceed 1,877 Btu/lb of moisture evaporated from feed. Compliance with this limit shall be determined by dividing the cumulative annual heat input to the dryer by the difference in moisture content (in lbs, using annual average of monthly sampling) between the feed mixture before and after being dried in dryers. [CCR Title 14, Division 6, Chapter 3, § 15000-15387 (CEQA)]
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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. The unit shall only be fired on PUC regulated natural gas. [District Rules 2201, 4309, and 4801]
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 2.12 ppmvd NO<sub>x</sub> @ 19% O<sub>2</sub> (equivalent to 0.024 lb-NO<sub>x</sub>/MMBtu), 0.0076 lb-PM<sub>10</sub>/MMBtu, 5.31 ppmvd CO @ 19% O<sub>2</sub> (equivalent to 0.037 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O<sub>2</sub> concentration is greater than 19%, the corrected NO<sub>x</sub> or CO concentration is equal to the measured NO<sub>x</sub> or CO concentration. [District Rules 2201, 4201, 4301, and 4309]
6. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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]
7. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

8. 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]
9. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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]
10. 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]
11. Source testing to measure NO<sub>x</sub> and CO emissions, from each extruder line, when fired on natural gas shall be conducted at least once every 24 months thereafter. [District Rules 2201 and 4309]
12. 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]
13. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
14. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
15. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
16. 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]
17. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
18. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309]
19. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rules 2201 and 4309]
20. 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, 2201, and 4309]

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

# Attachment II Emissions Profile



Permit #: S-8001-3-2	Last Updated
Facility: PERFECTION PET FOODS, LLC	07/14/2016 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	6728.0	799.0	2130.0	39021.0	1542.0
Daily Emis. Limit (lb/Day)	18.4	2.2	5.8	106.9	4.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	7162.0	0.0
Q2:	0.0	0.0	0.0	7162.0	0.0
Q3:	0.0	0.0	0.0	7162.0	0.0
Q4:	0.0	0.0	0.0	7163.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Attachment III  
AAQA



# San Joaquin Valley Air Pollution Control District Risk Management Review

To: Richard Edgehill – Permit Services  
From: Marissa Williams – Technical Services  
Date: July 20, 2016  
Facility Name: Perfection Pet Foods  
Location: 1111 N Miller Park Court, Visalia, CA  
Application #(s): S-8001-3-2  
Project #: S-1162665

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## A. AAQA SUMMARY

### Criteria Pollutant Modeling Results\*

Diesel ICE	1 Hour	3 Hours	8 Hours.	24 Hours	Annual
CO	Pass	X	Pass	X	X
NO <sub>x</sub>	X	X	X	X	X
SO <sub>x</sub>	X	X	X	X	X
PM <sub>10</sub>	X	X	X	X	X
PM <sub>2.5</sub>	X	X	X	X	X

\*Results were taken from the attached PSD spreadsheet.

### Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

#### Unit 3-2

1. All exhaust stacks shall vent vertically upward. The vertical exhaust flows shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction.  
[District Rule 2201]

## B. Ambient Air Quality Analysis

### I. Project Description

Technical Services received a request on July 14, 2016 to perform an Ambient Air Quality Analysis for the modification of an existing manufacturing operation. This modification includes increasing the CO limit of three natural-gas fired dryers (two 12 MMBtu/hr units and one 8 MMBtu/hr unit) to the limit allowed by SJVAPCD Rule 4309 – to 20 ppm at 19% O<sub>2</sub>. Since only CO increases are reported, no health risk assessment is required.

## II. Analysis

For the AAQA, AERMOD was used with the parameters outlined below and meteorological data for 2007-2010 from Visalia to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a fence line receptor grid.

The following parameters were used for the review:

Analysis Parameters Unit 3-2 (12 MMBtu Units & 8 MMBtu Unit, each)			
Source Type	Point	Location Type	Urban
Stack Height (m)	12.2	Closest Receptor (m)	100
Stack Diameter. (m)	0.9	Type of Receptor	Business
Stack Exit Velocity (m/s)	12.9	Max Hours per Year	8,760
Stack Exit Temp. (°K)	355.2	Fuel Type	NG

Technical Services performed modeling for criteria pollutant CO with the emission rates below:

Unit #	NO <sub>x</sub> (Lbs.)		SO <sub>x</sub> (Lbs.)		CO (Lbs.)		PM <sub>10</sub> (Lbs.)	
	Hr.	Yr.	Hr.	Yr.	Hr.	Yr.	Hr.	Yr.
3-2	N/A	N/A	N/A	N/A	106.9	39,021	N/A	N/A

## III. Conclusion

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

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on Page 1 of this report must be included for these proposed units.

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. AAQA Summary
- D. AAQA Parameters

Attachment IV  
Draft ATC



San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

DRAFT

PERMIT NO: S-8001-3-2

LEGAL OWNER OR OPERATOR: PERFECTION PET FOODS, LLC  
MAILING ADDRESS: P.O. BOX 1029  
GOSHEN, CA 93227

LOCATION: 1111 N MILLER PARK COURT  
VISALIA, CA 93291

### EQUIPMENT DESCRIPTION:

MODIFICATION OF 300 HP EXTRU-TECH MODEL E750 EXTRUDER DISCHARGING TO AN 8 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1042-2P-AFII DRYER COOLER, 400 HP EXTRU-TECH MODEL E925 EXTRUDER DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1852-AFII DRYER COOLER, PRODUCT COATING, CONVEYORS, ELEVATORS, AUGERS, AND TURN HEADS: INCREASE CO LIMIT OF DRYER COOLERS TO 20 PPMV @ 19% O<sub>2</sub>

## CONDITIONS

1. ATC S-8001-3-1 shall be implemented prior to or concurrent with this ATC. [District Rule 2201]
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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. The units shall only be fired on PUC regulated natural gas. [District Rules 2201, 4309, and 4801]
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 2.12 ppmvd NO<sub>x</sub> @ 19% O<sub>2</sub> (equivalent to 0.024 lb-NO<sub>x</sub>/MMBtu), 0.0076 lb-PM<sub>10</sub>/MMBtu, 20 ppmvd CO @ 19% O<sub>2</sub> (equivalent to 0.1392 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O<sub>2</sub> concentration is greater than 19%, the corrected NO<sub>x</sub> or CO concentration is equal to the measured NO<sub>x</sub> or CO concentration. [District Rules 2201, 4201, 4301, and 4309]
6. {3741} The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

S-8001-3-2 - Jtl 14 2018 12:46PM - EDGEHILL - Joint Inspection NOT Required

7. {3742} If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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]
8. {3743} 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]
9. {3744} The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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]
10. {3713} 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]
11. Source testing to measure NO<sub>x</sub> and CO emissions from this unit when fired on natural gas shall be conducted once every 24 months. [District Rules 2201 and 4309]
12. {3715} 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]
13. {3718} NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
14. {3719} CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
15. {3720} Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
16. {109} 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]
17. {3721} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
18. {3722} All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309]
19. Permittee shall maintain records which demonstrate the units are fired exclusively on PUC quality natural gas. [District Rules 2201 and 4309]
20. 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, 2201, and 4309]

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