



SEP 20 2016

Mr. Thomas Williams  
California Dairies, Inc  
P O Box 11865  
Fresno, CA 93775-1865

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-402  
Project # C-1150419**

Dear Mr. Williams:

The District has issued the Final Renewed Title V Permit for California Dairies, Inc (see enclosure). The preliminary decision for this project was made on May 25, 2016. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation. These permits address all deficiencies cited by the EPA.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

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

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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

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

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# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Final Title V Permit Renewal Evaluation  
California Dairies, Inc  
C-402

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# TITLE V PERMIT RENEWAL EVALUATION

## *Milk Processing*

**Engineer:** Robert Gilles  
**Date:** September 8, 2016

**Facility Number:** C-402  
**Facility Name:** California Dairies, Inc  
**Mailing Address:** P O Box 11865  
Fresno, CA 93775

**Contact Name:** Thomas Williams  
**Title:** Director of Environmental Compliance  
**Phone:** (559) 233-5154

**Responsible Official:** Thomas Williams  
**Title:** Director of Environmental Compliance

**Project # :** C-1150419  
**Deemed Complete:** February 27, 2015

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## I. PROPOSAL

California Dairies, Inc submitted a permit application to renew their Title V permit. During this renewal process, the existing permits will be reviewed and revised to include up-to-date requirements of all applicable District, State, and Federal rules that were adopted or amended since the issuance of the previous Title V permit on August 31, 2012. The expiration date for the Title V permit is January 31, 2016.

The purpose of this document is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

Note that during the preliminary notice period, the District received comments from EPA Region IX. A Summary of the comments and the District's responses is provided in Appendix D. With this final Renewal Evaluation and the attached renewed Title V Operating Permits (Appendix A), the District has addressed each comment and no further noticing period is needed.

## II. FACILITY LOCATION

The facility is located at 755 "F" St in Fresno, California.

## III. EQUIPMENT LISTING

A detailed facility printout, listing all permitted equipment at the facility, is included as Attachment C.

## IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of general permit templates.

## V. SCOPE OF EPA AND PUBLIC REVIEW

As mentioned in Section IV previously, the applicant does not propose to use any model general permit templates. Therefore, the proposed Title V permit in its entirety will be subject to EPA and public review.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated and Evaluated

The following rules are updated since the previous Title V permit was issued in August 31, 2012, or are addressed in this evaluation because they were not adequately addressed previously.

- District Rule 2020, Exemptions (Amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (Amended February 18, 2016)
- District Rule 2520, Federally Mandated Operating Permits (Amended June 21, 2001)
- District Rule 4702, Internal Combustion Engines (Amended November 14, 2013)

- 40 CFR Part 60, Subpart IIII, Standards of Performance for Compression Ignition Internal Combustion Engines (Amended January 30, 2013)
- 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Amended March 6, 2013)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (Amended June 25, 2013)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction (Amended June 25, 2013)

#### **B. Rules Removed**

There are no applicable rules that were removed since the previous Title V permit was issued.

#### **C. Rules Added**

- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011, effective November 26, 2012 – SIP Approved)

#### **D. Rules Not Updated**

- District Rule 1080, Stack Monitoring (Amended December 17, 1992)
- District Rule 1081, Source Sampling (Amended December 16, 1993)
- District Rule 2010, Permits Required (Amended December 17, 1992)
- District Rule 2031, Transfer of Permits (Amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (Amended December 17, 1992)
- District Rule 2080, Conditional Approval (Amended December 17, 1992)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4201, Particulate Matter Concentration (Amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate (Amended December 17, 1992)

- District Rule 4301, Fuel Burning Equipment (Amended December 17, 1992)
- District Rule 4304, Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters (Adopted October 19, 1995)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters - Phase 2 (Amended August 21, 2003)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters - Phase 3 (Amended October 16, 2008)
- District Rule 4309, Dryers, Dehydrators, and Ovens (adopted December 15, 2005)
- District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (Adopted October 16, 2008)
- District Rule 4351, Boilers, Steam Generators, and Process Heaters – Phase 1 (amended August 21, 2003)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 4701, Internal Combustion Engines – Phase 1 (Amended August 21, 2003)
- District Rule 4801, Sulfur Compounds (Amended December 17, 1992)
- District Rule 8011, General Requirements (Amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction and Other Earthmoving Activities (Amended August 19, 2004)
- District Rule 8031, Bulk Materials (Amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (Amended August 19, 2004)
- District Rule 8051, Open Areas (Amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (Amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (Amended August 19, 2004)
- 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Amended February 16, 2012)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (Amended July 20, 2004)

- 40 CFR Part 68, Chemical Accident Prevention Provisions (Amended April 9, 2004)

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

For this facility, the following are not federally enforceable and will not be discussed in further detail:

### A. Rules Added

There are no applicable rules that were added since the previous Title V permit was issued.

### B. Rules Updated

There are no applicable rules that were updated since the previous Title V permit was issued.

### C. Rules Not Updated

- District Rule 1070, Inspections (Amended December 17, 1992)
- District Rule 1100, Equipment Breakdown (Amended December 17, 1992)
- District Rule 1160, Emission Statements (Adopted November 18, 1992)
- District Rule 2040, Applications (Amended December 17, 1992)
- District Rule 4102, Nuisance (Amended December 17, 1992)
- Title 17 California Code of Regulations (CCR) Section 93115, Airborne Toxic Control Measure for Stationary Compression Ignition Engines (Effective May 19, 2011)

## VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section serves to address rules that

have been amended or added since the last Title V permit action. This compliance section will also address rules that were not adequately addressed in the previous Title V permitting action.

**A. District Rule 2020, Exemptions**

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

District Rule 2020 was last amended on December 18, 2014. The primary purpose of the amendments was to: clarify alignment of District Rule 2020 with the California Air Resources Board's (ARB) Portable Equipment Registration Program (PERP); exempt certain oilfield tanks with insignificant emissions; and, update standardized testing provisions. Because the amendments to District Rule 2020 do not affect the requirements for the permit units at this site and no additional conditions are required, the changes will not be addressed further in this evaluation.

**B. District Rule 2201, New and Modified Stationary Source Review Rule**

District Rule 2201 applies to all new stationary sources and all modifications to existing stationary sources which are subject to the District permit requirements and after construction emit or may emit one or more affected pollutant. This rule's applicability and requirements (e.g., BACT, offsets, public notice, compliance assurance, etc.) were evaluated while reviewing each application received from the facility since the issuance of the previous Title V permit. The applicable requirements were already incorporated into Title V permit either via Certificate of Conformity (COC), Minor Permit Modification, or Significant Permit Modification.

This rule has been amended since the last Title V permit action for this facility. The requirements of this rule are applicable to new and modified stationary sources. Per Section 3.25 of the rule, a modification is any one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.



- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Since this source is an existing source, and since the renewal of the Title V permit does not constitute a modification as defined in Section 3.25 of the rule, the updated requirements of this rule are not applicable at this time. Since these amendments to District Rule 2201 do not affect the requirements for the permit units at this site and no additional conditions are required, the changes will not be addressed further in this evaluation.

**C. District Rule 2410, Prevention of Significant Deterioration**

This rule was added on June 16, 2011 and became effective on November 26, 2012. The renewal of the Title V permit does not constitute a PSD modification and none of the current PTOs include any PSD conditions. Since the requirements of District Rule 2410 do not affect the requirements for the permit units at this site and no additional conditions are required, the requirements of this rule will not be addressed further in this evaluation.

**D. District Rule 2520, Federally Mandated Operating Permits**

This rule has not been updated since the previous Title V action for this facility; however, the requirements of section 9.3.2 of the rule were not adequately addressed in the previous Title V action.

**Section 9.3 – Monitoring Requirements**

Section 9.3.2 states that where applicable requirements do not require periodic testing or instrumental or non-instrumental monitoring, periodic monitoring to yield reliable data for the relevant time period that are representative of the source's compliance with the permit, as reported pursuant to the requirements of section 9.5 of this rule. Such monitoring requirements shall assure use of terms, test methods, units, averaging periods, and other statistical conventions consistent with applicable requirement. Recordkeeping requirements may be sufficient to meet the requirements of this section.

Both permit unit C-402-4 and permit unit '-10 include emission limits for SO<sub>x</sub>, PM<sub>10</sub>, and VOC but there is no corresponding testing or monitoring requirement for these pollutants from an applicable District rule. Therefore, the requirements of section 9.3.2 of this rule are satisfied with the following:

a. *C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM*

- Condition 2 of the requirements for the draft renewed Title V operating permit replaces condition 2 of the requirements for the previous Title V operating permit and conditions 24 and 25 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 2520 for SO<sub>x</sub> and PM<sub>10</sub>.
- Condition 26 has been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 2520 for VOCs.

b. *C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O<sub>2</sub> CONTROLLER*

- Condition 4 of the requirements for the draft renewed Title V operating permit replaced condition 4 of the requirements for the previous Title V operating permit and conditions 26 and 27 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 2520 for SO<sub>x</sub> and PM<sub>10</sub>.
- Condition 2 of the requirements for the draft renewed Title V operating permit replaces condition 2 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 2520 for VOCs.

**E. District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr***

Compliance with the requirements of District Rule 4320 will be demonstrated in this Title V renewal since this rule was not adequately addressed in the previous Title V action for this facility.

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO), oxides of sulfur (SO<sub>2</sub>), and particulate matter 10

microns or less (PM<sub>10</sub>) from boilers, steam generators, and process heaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a total rated heat input greater than 5 million Btu per hour.

Permit units C-402-4 and '-10 are subject to the requirements of District Rule 4320.

#### **Section 4.0 – Exemptions**

Section 4.2 provides an exemption from the requirements of Section 5.2 for a boiler, steam generator, or process heater (unit) when burning any fuel other than California PUC quality natural gas during California PUC quality natural gas curtailment provided all of the following conditions are met:

- Fuels other than California PUC quality natural gas are burned no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing, as limited by Permit to Operate; and
- NOx emissions shall not exceed 150 ppmv or 0.215 lb/MMBtu. Demonstration of compliance with this limit shall be made by either source testing, continuous emission monitoring system (CEMS), an APCO approved Alternate Monitoring System, or an APCO approved portable NOx analyzer.

This exemption is applicable to both units (C-402-4 and '-10) since each permit includes conditions that ensure compliance with the requirements of section 4.2.

- a. *C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM*
- Condition 2 of the requirements for the draft renewed Title V operating permit replaces condition 2 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 4320.
  - Condition 3 of the requirements for the draft renewed Title V operating permit replaces condition 3 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 4320.

- Conditions 19 and 20 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.
- b. C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O2 CONTROLLER*
- Condition 4 of the requirements for the draft renewed Title V operating permit replaces condition 4 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 4320.
  - Condition 5 of the requirements for the draft renewed Title V operating permit replaces condition 5 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 4320.
  - Conditions 22, 23, and 24 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.

### **Section 5.0 – Requirements**

Section 5.1 specifies the following compliance options for this Rule:

- 5.1.1 Operate the unit to comply with the emission limits specified in Sections 5.2 and 5.4; or
- 5.1.2 Pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4; or
- 5.1.3 Comply with the applicable Low-use Unit requirements of Section 5.5.

The facility is complying with the requirements of Section 5.1.2 for both units; therefore, the requirements of Sections 5.3 and 5.4 are applicable to both units.

### **Section 5.3 – Annual Fee Calculation**

Section 5.3.1 outlines the calculation methods for determining the total annual fee to the District.

- a. *C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM*
- Conditions 1 and 4 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this section of District Rule 4320.
  - Condition 26 has been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.
- b. *C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O2 CONTROLLER*
- Conditions 1 and 8 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this section of District Rule 4320.
  - Condition 28 has been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.

**Section 5.4 – Particulate Matter Control Requirements**

Section 5.4.1 of this rule requires the operator to comply with one of the following requirements:

- 5.4.1.1 On and after the applicable NOx Compliance Deadline specified in Section 5.2 Table 1, operators shall fire units exclusively on PUC-regulated natural gas, commercial propane, butane, or liquefied petroleum gas, or a combination of such gases;
- 5.4.1.2 On and after the applicable NOx Compliance Deadline specified in Section 5.2 Table 1, operators shall limit fuel sulfur content to no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet; or

- 5.4.1.3 On and after the applicable NOx Compliance Deadline specified in Section 5.2 Table 1, operators shall install and properly operate an emission control system that reduces SO<sub>2</sub> emissions by at least 95% by weight; or limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% O<sub>2</sub>.

Both units may be fired on only PUC-regulated natural gas or commercial propane (during PUC-quality natural gas curtailment). Therefore, compliance with the requirements of section 5.4.1.1 is expected.

a. *C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM*

- Condition 2 of the requirements for the draft renewed Title V operating permit replaces condition 2 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 4320.

b. *C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O<sub>2</sub> CONTROLLER*

- Condition 4 of the requirements for the draft renewed Title V operating permit replaces condition 4 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 4320.

### **Section 5.5 – Low Use**

This section outlines requirements for a unit that was installed prior to January 1, 2009 and is limited by Permit to Operate to less than or equal to 1.8 billion Btu per calendar year heat input. Both units have a permitted annual heat input of greater than 1.8 billion Btu; therefore, this section is not applicable.

**Section 5.6 – Startup and Shutdown Provisions**

Section 5.6 outlines the startup and shutdown provisions in the rule. Neither unit included startup or shutdown provisions; therefore, this section is not applicable.

**Section 5.7 – Monitoring Provisions**

Section 5.7.1 requires the owner of any unit subject to the applicable emission limits in Section 5.2 to install and maintain an operational APCO-approved Continuous Emission Monitoring System (CEMS) or implement an APCO-approved Alternate Monitoring System. Neither unit is subject to the emission limits from Section 5.2; therefore, this section is not applicable.

Section 5.7.2 outlines monitoring requirements for units subject to Sections 5.5.1 or 5.5.2. Neither unit is subject to either Sections 5.5.1 or 5.5.2; therefore, this section is not applicable.

Section 5.7.3 requires that the operator of a unit subject to Section 5.5 install and maintain an operational non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit. Neither unit is subject to Section 5.5; therefore, this section is not applicable.

Section 5.7.4 outlines monitoring requirements for units that are operated at seasonal sources and are subject to 40 CFR part 60, subpart Db. This facility is not a seasonal source and neither unit is subject to the provisions of 40 CFR part 60, subpart Db since the units have a maximum rated heat input less than 100 MMBtu/hr; therefore, this section is not applicable.

Section 5.7.5 states the approval requirements for an alternative monitoring system or parametric monitoring system. Neither unit is subject to the requirement to install a parametric monitoring system or implement an alternative monitoring system for compliance with this rule; therefore, this section is not applicable.

Section 5.7.6.1 requires that operators complying with Sections 5.4.1.1 or 5.4.1.2 provide an annual fuel analysis to the District unless a more frequent sampling and reporting period is included in the Permit to Operate.

- a. *C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM*
- Conditions 16 and 24 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.
- b. *C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O2 CONTROLLER*
- Conditions 18 and 26 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.

Section 5.7.6.2 outlines SO<sub>x</sub> monitoring requirements for operators complying with Section 5.4.1.3 by installing and operating a control device. Neither unit is equipped with a SO<sub>x</sub> control device; therefore, this section is not applicable.

Section 5.7.6.3 requires operators that are complying with Section 5.4.1.3 to perform an annual source test unless a more frequent sampling and reporting period is included in the PTO. Neither unit will be equipped with a SO<sub>x</sub> control device; therefore, this section is not applicable.

### **Section 5.8 – Compliance Monitoring**

The following requirements and provisions from Sections 5.8.1 through 5.8.5 are applicable to these units:

- The operator of any unit shall have the option of complying with either the applicable heat input, in lb/MMBtu, emission limits or the concentration, in ppmv, emission limits specified in Section 5.2. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling).
- 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. Unless otherwise 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.

- a. *C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM*
- Conditions 9 and 10 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.
- b. *C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O2 CONTROLLER*
- Conditions 12 and 13 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.

### **Section 6.1 – Recordkeeping**

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.5 shall be maintained for five calendar years and shall be made available to the APCO upon request. The following are the applicable requirements and provisions from Section 6.1.1 through 6.1.5:

- The operator of any unit operated under the exemption of Section 4.2 shall monitor and record, for each unit, the cumulative annual hours of operation on each fuel other than natural gas during periods of natural gas curtailment and equipment testing. The NO<sub>x</sub> emission concentration, expressed in ppmv or lb/MMBtu, for each unit that is operated during periods of natural gas curtailment shall be recorded. Failure to maintain records required by Section 6.1.1 or information contained in the records that demonstrates noncompliance with the conditions for exemption under Section 4.2 will result in loss of exemption status. On and after the applicable compliance schedule specified in Section 5.2 Table 1, any unit losing an exemption status shall be brought into full compliance with this rule as specified in Section 7.2.

a. *C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM*

- Conditions 19, 20, and 22 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.
- Condition 27 of the requirements for the draft renewed Title V operating permit replaces condition 22 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 4320.
- Condition 28 of the requirements for the draft renewed Title V operating permit ensures compliance with the requirements of this section of District Rule 4320.

b. *C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O2 CONTROLLER*

- Conditions 22, 23, 24, and 25 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.
- Condition 29 of the requirements for the draft renewed Title V operating permit replaces condition 19 of the requirements for the previous Title V operating permit and ensures compliance with the requirements of this section of District Rule 4320.
- Conditions 31 has been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this section of District Rule 4320.

**Section 6.2 – Test Methods**

Section 6.2 identifies the District-approved source testing methods.

a. *C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM*

- Conditions 13, 14, 15, and 16 have been removed from the requirements for the previous Title V operating permit since there is no corresponding requirement to complete source testing for VOC, SO<sub>x</sub>, or PM<sub>10</sub> emissions for these units and without a source testing requirement, these conditions are not needed.
- Conditions 13, 14, 15, and 16 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this section of District Rule 4320.

b. *C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O2 CONTROLLER*

- Conditions 15, 16, 17, and 18 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this section of District Rule 4320.

**Section 6.3 – Compliance Testing**

Section 6.3.1 outlines the source testing requirements for units subject to the requirements in Section 5.2. Neither unit is subject to the requirements in Section 5.2; therefore, this section is not applicable.

Section 6.3.2 outlines an option for representative source testing in lieu of compliance with 6.3.1. Neither unit is subject to the requirements of Section 6.3.1; therefore, this section is not applicable.

**Section 6.4 – Emission Control Plan (ECP)**

Section 6.4.1 requires that no later than January 1, 2010, the operator of any unit must submit an Emissions Control Plan (ECP) according to the compliance schedule in Section 7.0 of the Rule. In compliance with the requirements of this section, the facility submitted an approvable ECP on June 15, 2009 (see project C-1092849); therefore, the facility is in compliance with the requirements of the this section for the units. No further action is required.

**Section 7.0 – Compliance Schedule**

Section 7.0 contains the compliance schedule for units subject to this rule. The units are in compliance with all requirements of this rule, as demonstrated above, and continued compliance is expected.

**Conclusion**

Conditions will be included on each permit, as shown, to ensure compliance with each section of this rule; therefore, compliance with the requirements of District Rule 4320 is expected. No further discussion is required.

**F. District Rule 4702, Internal Combustion Engines**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SO<sub>x</sub>) from internal combustion engines. This rule applies to any internal combustion engine rated at 25 brake horsepower or greater. Compliance with the requirements and provisions of this rule for permit unit C-402-11 was evaluated with the last Title V action and applicable requirements were incorporated into Title V permit.

This rule has been amended since the last Title V permit action for this facility. The amendments to this rule were only to Sections 3.37, 5.2, 5.10.2, 7.5.2.1, and 7.6.2.2 and were administrative clarifications of existing rule requirements and did not result in new or more stringent regulatory controls and did not affect air quality or emissions limitations. Pursuant to Section 4.2, except for the requirements of Sections 5.9 and 6.2.3, the requirements of this rule do not apply to an emergency standby engine or a low-use engine provided that the engine is operated with an operating nonresettable elapsed time meter.

a. *C-402-11-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR*

- This engine is an emergency standby engine equipped with a nonresettable elapsed time meter. Therefore, the amended sections of this rule are not applicable to this engine. Since the amendments to District Rule 4702 do not affect the requirements for any permit unit at this site and no additional conditions are required, the changes will not be addressed further in this evaluation.

**G. 40 CFR Part 60, Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

The provisions of this subpart are applicable to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commence construction after July 11, 2005 where the stationary CI ICE are manufactured after April 1, 2006 and are not fire pump engines.

a. *C-402-11-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR*

- Construction for this engine (the date the engine was ordered by the owner or operator) commenced prior to July 11, 2005 and the engine was manufactured prior to April 1, 2006. Therefore, the provisions of this subpart are not applicable to this engine.

**H. 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

This subpart applies to owners and operators of stationary reciprocating internal combustion engines (RICE) operated at a major or area source of Hazardous Air Pollutant (HAP) emissions. Compliance with the requirements and provisions of this subpart for permit unit C-402-11 was evaluated with the last Title V action and applicable requirements were incorporated into Title V permit.

This subpart has been amended since the last Title V permit action for this facility. The EPA made the following amendments to this subpart:

- added an alternative compliance demonstration option for stationary 4-stroke rich burn (4SRB) spark ignition (SI) engines subject to a 76 percent or more formaldehyde reduction requirement;
  - finalized limitations on the operation of emergency engines for emergency demand response programs;
  - finalized management practices for owners and operators of existing stationary 4-stroke SI engines above 500 HP that are area sources of HAP emissions and where the engines are remote from human activity;
  - specified that any existing CI engine above 300 HP at an area source of HAP emissions that was certified to meet the Tier 3 engine standards and was installed before June 12, 2006, is in compliance with the NESHAP;
  - finalized amendments to the requirements for existing stationary Tier 1 and Tier 2 certified CI engines located at area sources that are subject to state and locally enforceable requirements requiring replacement of the engine by June 1, 2018;
  - broadened the definition of remote area sources in Alaska in the RICE NESHAP; and
  - required compliance with management practices rather than numeric emission limits in the RICE NESHAP for existing CI RICE on offshore drilling vessels on the Outer Continental Shelf (OCS) that become subject to the RICE NESHAP as a result of the operation of the OCS regulations (40 CFR part 55).
- a. *C-402-11-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR*
- This engine is an emergency standby compression ignition engine that is not operated in an emergency demand response program, was not certified to meet the Tier 3 engine standards, is not subject to state and locally enforceable requirements requiring replacement of the engine by June 1, 2018, is not located and operated at a remote area source in Alaska, and is not on an offshore drilling vessel on the Outer Continental Shelf (OCS). Therefore, the amended sections of this subpart are not applicable to this engine. Because the amendments to 40 CFR part 63, subpart ZZZZ do not affect the requirements for any permit unit at this site and no additional conditions are required, the changes will not be addressed further in this evaluation.

**I. 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)**

**§64.2 – Applicability**

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units at a major source that are required to obtain a part 70 or 71 permit that meet all of the following three criteria:

- 1) The unit must have an emission limit for the pollutant;
- 2) The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (lb/year)
VOC	20,000
NO <sub>x</sub>	20,000
CO	200,000
PM <sub>10</sub>	140,000
SO <sub>x</sub>	140,000

Each permit unit at this facility was evaluated for compliance with CAM requirements during the previous Title V action for this facility. The requirements of this subpart have not been amended since the previous Title V action; however, to ensure continued compliance with the requirements of this subpart, compliance will be demonstrated with this Title V renewal.

- a. *C-402-2-6: 28.0 MMBTU/HR NATURAL GAS/LPG FIRED DAMROW COMPANY MODEL CCT-85-20X40 TOWER DRYER WITH A MAXON RC-NP-1 BURNER SERVED BY TWO DUSTEX MODEL 3610-14-34 DUST COLLECTORS*

This permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. However, the unit does not have add-on control devices for NO<sub>x</sub>, SO<sub>x</sub>, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for PM<sub>10</sub> so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

$\text{EF}_{\text{Controlled}}$  = 0.344 lb-PM<sub>10</sub>/ton (current PTO limit)

CE = baghouses; 99% (District assumption)

Throughput = 120.0 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.344 \text{ lb-PM}_{10}/\text{ton} \times 120.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \div (1-0.99) \\ &= 1,506,720 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is subject to CAM for PM<sub>10</sub>.

- Conditions 29 through 34 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this regulation.

***b. C-402-4-5: 61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM***

This permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. However, the unit does not have add-on control devices for SO<sub>x</sub>, PM<sub>10</sub>, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for NO<sub>x</sub> so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\text{Pre-control PE NO}_x = (\text{EF}_{\text{Controlled, lb-NO}_x/\text{MMBtu}} \times \text{Burner Rating, MMBtu/hr} \times \text{Operation, hr/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

To determine the control efficiency for FGR, the following emissions factors from AP-42, Table 1.4-1 (7/98) for boilers <100 MMBtu/hr will be used:



	NOx Emission Factor (lb/10 <sup>6</sup> scf)
Uncontrolled	100
Controlled – low NOx burners	50
Controlled – low NOx burners/ FGR	32

The control efficiency of FGR is calculated as follows:

Reduction from adding FGR to a boiler with low NOx burner

$$100 \times [(50-32) \div 50] = 36\%$$

Pre-control PE

$$\begin{aligned} \text{Pre-control PE NOx} &= (0.0109 \text{ lb-NOx/MMBtu} \times 61.0 \text{ MMBtu/hr} \times \\ &24 \text{ hr/day} \times 365 \text{ day/year}) \div (1-0.36) \\ &= 9,101 \text{ lb-NOx/year} \end{aligned}$$

Since the pre-control PE for NOx for this permit unit is not greater than the major source threshold of 20,000 lb-NOx/year, this unit is not subject to CAM for NOx.

- c. **C-402-5-6: 20.0 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE**

This permit unit has emissions limits for NOx, SOx, PM<sub>10</sub>, CO, and VOC. However, the unit does not have add-on control devices for NOx, SOx, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for PM<sub>10</sub> so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (EF_{\text{Controlled}} \text{ lb-PM}_{10}/\text{ton} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-CE)$$

Where,

$$\begin{aligned} EF_{\text{Controlled}} &= 0.606 \text{ lb-PM}_{10}/\text{ton (current PTO limit)} \\ CE &= \text{baghouses; 99\% (District assumption)} \\ \text{Throughput} &= 90.0 \text{ ton-product/day (current PTO limit)} \end{aligned}$$

$$\begin{aligned}\text{Operating Limit} &= 6,760 \text{ hr/year (current PTO)} \\ &= 6,760 \text{ hr/yr} \div 24 \text{ hr/day} \\ &= 282 \text{ days/year}\end{aligned}$$

$$\begin{aligned}\text{Pre-control PE PM}_{10} &= (0.606 \text{ lb-PM}_{10}/\text{ton} \times 90.0 \text{ ton/day} \times 282 \\ &\text{ day/year}) \div (1-0.99) \\ &= 1,538,028 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is subject to CAM for PM<sub>10</sub>.

- Conditions 32 through 37 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this regulation.

*d. C-402-6-8: 20.0 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES*

This permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. However, the unit does not have add-on control devices for NO<sub>x</sub>, SO<sub>x</sub>, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for PM<sub>10</sub> so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled}} \text{ lb-PM}_{10}/\text{ton} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

$$\text{EF}_{\text{Controlled}} = 0.309 \text{ lb-PM}_{10}/\text{ton (current PTO limit)}$$

$$\text{CE} = \text{baghouses; 99\% (District assumption)}$$

$$\text{Throughput} = 144.0 \text{ ton-product/day (current PTO limit)}$$

$$\begin{aligned}\text{Pre-control PE PM}_{10} &= (0.309 \text{ lb-PM}_{10}/\text{ton} \times 144.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \div (1-0.99) \\ &= 1,624,104 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is subject to CAM for PM<sub>10</sub>.

- Conditions 29 through 34 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this regulation.

e. *C-402-10-3: 67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS A BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM WITH O2 CONTROLLER*

This permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. However, the unit does not have add-on control devices for SO<sub>x</sub>, PM<sub>10</sub>, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for NO<sub>x</sub> so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\text{Pre-control PE NO}_x = (\text{EF}_{\text{Controlled, lb-NO}_x/\text{MMBtu}} \times \text{Burner Rating, MMBtu/hr} \times \text{Operation, hr/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

As shown previously, the use of FGR results in 36% reduction in NO<sub>x</sub> emissions. Therefore, the pre-control PE for this unit is calculated as follows:

$$\begin{aligned} \text{Pre-control PE NO}_x &= (0.011 \text{ lb-NO}_x/\text{MMBtu} \times 67.0 \text{ MMBtu/hr} \times \\ &24 \text{ hr/day} \times 365 \text{ day/year}) \div (1-0.36) \\ &= 10,088 \text{ lb-NO}_x/\text{year} \end{aligned}$$

Since the pre-control PE for NO<sub>x</sub> for this permit unit is not greater than the major source threshold of 20,000 lb-NO<sub>x</sub>/year, this unit is not subject to CAM for NO<sub>x</sub>.

- f. ***C-402-11-2: 2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR***

This permit unit has emissions limits for NOx and PM<sub>10</sub>. However, the unit does not have add-on control devices for these pollutants; therefore, this unit cannot be subject to CAM for these pollutants.

- g. ***C-402-13-2: START-UP HOPPER SERVED BY AN 18,900 CFM DONALDSON TORIT MODEL DFT 3-24 DUST COLLECTOR***

This permit unit may be subject to CAM for PM<sub>10</sub> since the unit has an emission limit for PM<sub>10</sub> and is equipped with add-on control for PM<sub>10</sub>. The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

$$\begin{aligned} \text{EF}_{\text{Controlled}} &= 0.073 \text{ lb-PM}_{10}/\text{ton} \text{ (current PTO limit)} \\ \text{CE} &= \text{dust collector; 99\% (District assumption)} \\ \text{Throughput} &= 5.5 \text{ ton-product/day (current PTO limit)} \end{aligned}$$

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.073 \text{ lb-PM}_{10}/\text{ton} \times 5.5 \text{ ton/day} \times 365 \\ &\text{ day/year}) \div (1-0.99) \\ &= 14,655 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is not greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is not subject to CAM for PM<sub>10</sub>.

- h. ***C-402-14-3: BAGGING OPERATION INCLUDING AN AVAPAC RECEIVER AND A TOTE RECEIVER ALL SERVED BY AN 18,900 CFM DONALDSON TORIT MODEL DFT 3-24 DUST COLLECTOR***

This permit unit may be subject to CAM for PM<sub>10</sub> since the unit has an emission limit for PM<sub>10</sub> and is equipped with add-on control for PM<sub>10</sub>. The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

$EF_{\text{Controlled}}$  = 0.003 lb-PM<sub>10</sub>/ton (current PTO limit)  
CE = dust collector; 99% (District assumption)  
Throughput = 318.0 ton-product/day (current PTO limit)

$$\begin{aligned}\text{Pre-control PE PM}_{10} &= (0.003 \text{ lb-PM}_{10}/\text{ton} \times 318.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \div (1-0.99) \\ &= 34,821 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is not greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is not subject to CAM for PM<sub>10</sub>.

*i. C-402-15-6: 12,000-GALLON POWDER MILK STORAGE SILO #1 SERVED BY A SOCK FILTER*

This permit unit may be subject to CAM for PM<sub>10</sub> since the unit has an emission limit for PM<sub>10</sub> and is equipped with add-on control for PM<sub>10</sub>. The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (EF_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-CE)$$

Where,

$EF_{\text{Controlled}}$  = 0.012 lb-PM<sub>10</sub>/ton (current PTO limit)  
CE = dust collector control efficiency; 99% (District assumption)  
Throughput = 475.0 ton-product/day (current PTO limit)

$$\begin{aligned}\text{Pre-control PE PM}_{10} &= (0.012 \text{ lb-PM}_{10}/\text{ton} \times 475.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \div (1-0.99) \\ &= 208,050 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is subject to CAM for PM<sub>10</sub>.

$$\begin{aligned}\text{Post-control PE PM}_{10} &= (0.012 \text{ lb-PM}_{10}/\text{ton} \times 475.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \\ &= 2,081 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

Since the post-control PM<sub>10</sub> emissions are less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year the daily monitoring visible

inspection complies with the minimum monitoring frequency as required by this regulation.

CAM compliance requires a daily visible emissions inspection on days Silo #1 is being loaded and is satisfied by monitoring recordkeeping, and evaluating visible emissions using EPA test method 22.

- Condition 7 of the draft renewed Title V operating permit replaces condition 7 of the previous Title V operating permit.
- Conditions 9 through 11 have been added to the requirements for the draft renewed Title V operating permit to ensure compliance with the requirements of this regulation.

*j. C-402-16-6: 12,000-GALLON POWDER MILK STORAGE SILO #2 SERVED BY BIN VENT FILTER*

This permit unit may be subject to CAM for PM<sub>10</sub> since the unit has an emission limit for PM<sub>10</sub> and is equipped with add-on control for PM<sub>10</sub>. The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

EF<sub>Controlled</sub> = 0.012 lb-PM<sub>10</sub>/ton (current PTO limit)

CE = dust collector; 99% (District assumption)

Throughput = 475.0 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.012 \text{ lb-PM}_{10}/\text{ton} \times 475.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \div (1-0.99) \\ &= 208,050 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is subject to CAM for PM<sub>10</sub>.

$$\begin{aligned} \text{Post-control PE PM}_{10} &= (0.012 \text{ lb-PM}_{10}/\text{ton} \times 475.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \\ &= 2,081 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

CAM compliance requires a daily visible emissions inspection on days Silo #3 is being loaded and is satisfied by monitoring recordkeeping, and evaluating visible emissions using EPA test method 22.

- Conditions 7 through 10 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this regulation.

*I. C-402-18-5: 30,000 GALLON POWDER MILK STORAGE SILO #4 SERVED BY BIN VENT FILTER*

This permit unit may be subject to CAM for PM<sub>10</sub> since the unit has an emission limit for PM<sub>10</sub> and is equipped with add-on control for PM<sub>10</sub>. The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

EF<sub>Controlled</sub> = 0.012 lb-PM<sub>10</sub>/ton (current PTO limit)

CE = dust collector; 99% (District assumption)

Throughput = 475.0 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.012 \text{ lb-PM}_{10}/\text{ton} \times 475.0 \text{ ton/day} \times 365 \\ &\text{day/year}) \div (1-0.99) \\ &= 208,050 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is subject to CAM for PM<sub>10</sub>.

Since the post-control PM<sub>10</sub> emissions are less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year the daily monitoring visible inspection complies with the minimum monitoring frequency as required by this regulation.

CAM compliance requires a daily visible emissions inspection on days Silo #4 is being loaded and is satisfied by monitoring recordkeeping, and evaluating visible emissions using EPA test method 22.

- Conditions 7 through 10 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this regulation.

*m. C-402-19-5: 30,000 GALLON POWDER MILK STORAGE SILO #5  
SERVED BY BIN VENT FILTER*

This permit unit may be subject to CAM for PM<sub>10</sub> since the unit has an emission limit for PM<sub>10</sub> and is equipped with add-on control for PM<sub>10</sub>. The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

$$\begin{aligned} \text{EF}_{\text{Controlled}} &= 0.012 \text{ lb-PM}_{10}/\text{ton} \text{ (current PTO limit)} \\ \text{CE} &= \text{dust collector; 99\% (District assumption)} \\ \text{Throughput} &= 475.0 \text{ ton-product/day (current PTO limit)} \end{aligned}$$

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.012 \text{ lb-PM}_{10}/\text{ton} \times 475.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \div (1-0.99) \\ &= 208,050 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM<sub>10</sub> for this permit unit is greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is subject to CAM for PM<sub>10</sub>.

Since the post-control PM<sub>10</sub> emissions are less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year the daily monitoring visible inspection complies with the minimum monitoring frequency as required by this regulation.

CAM compliance requires a daily visible emissions inspection on days Silo #5 is being loaded and is satisfied by monitoring recordkeeping, and evaluating visible emissions using EPA test method 22.

- Conditions 7 through 10 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this regulation.



**J. 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners**

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources. The purpose of this subpart is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level and this subpart applies to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

Compliance with the requirements and provisions of this subpart for this stationary source was evaluated with the last Title V action. This subpart has been amended since the last Title V permit action. Compliance with the provisions of this subpart is ensured by the following condition on the facility-wide permit.

*a. C-402-0-2: Facility-Wide Requirements*

- Condition 28 of the requirements of the draft renewed Title V operating permit ensures compliance with this subpart.

**K. 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction**

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources. The purpose of this subpart B is to implement section 609 of the Clean Air Act, as amended (Act) regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Act regarding certain servicing, maintenance, repair, and disposal of air conditioners in MVACs and MVAC-like appliances (as that term is defined in 40 CFR 82.152). These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

Compliance with the requirements and provisions of this subpart for this stationary source was evaluated with the last Title V action. This subpart has been amended since the last Title V permit action. Compliance with the

provisions of this subpart is ensured by the following condition on the facility-wide permit.

*a. C-402-0-2: Facility-Wide Requirements*

- Condition 27 of the requirements of the draft renewed Title V operating permit ensures compliance with this subpart.

## **IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### **A. Requirements Addressed by Model General Permit Templates**

The applicant does not propose to use any model general permit templates for this Title V renewal project.

### **B. Requirements not Addressed by Model General Permit Templates**

The applicant does not propose to use any model general permit templates for this Title V renewal project.

## **X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit

## **XI. ATTACHMENTS**

- A. Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. EPA Comments and District Responses

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# ATTACHMENT A

Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

**FACILITY:** C-402-0-2

**EXPIRATION DATE:** 01/31/2021

## **FACILITY-WIDE REQUIREMENTS**

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and Fresno County Rule 110] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and Fresno County Rule 110] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rules 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2; and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR Part 82, Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR Part 61, Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
40. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
41. On August 31, 2012, the initial Title V permit was issued. [District Rule 2520] Federally Enforceable Through Title V Permit
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin August 01 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-2-6

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

28.0 MMBTU/HR NATURAL GAS/LPG FIRED DAMROW COMPANY MODEL CCT-85-20X40 TOWER DRYER WITH A MAXON RC-NP-1 BURNER SERVED BY TWO DUSTEX MODEL 3610-14-34 DUST COLLECTORS

## PERMIT UNIT REQUIREMENTS

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1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Each dust collector shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from each dust collector serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 4101 and 2201] Federally Enforceable Through Title V Permit
5. Each dust collector shall operate at all times with a minimum differential pressure of 0.0 inches water column and a maximum differential pressure of 5.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The Damrow Tower dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. Dry milk powder production for this dryer shall not exceed a total of 120.0 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the Dustex dust collectors serving the Damrow Tower dryer shall not exceed 0.344 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NO<sub>x</sub> @ 19% O<sub>2</sub> (equivalent to 0.0606 lb-NO<sub>x</sub>/MMBtu), 0.003 lb-SO<sub>x</sub>/MMBtu, 11 ppmvd CO @ 19% O<sub>2</sub> (equivalent to 0.0764 lb-CO/MMBtu), or 0.11 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 and 4309] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
11. Source testing to measure NO<sub>x</sub> and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



12. Source testing to measure PM10 emissions (measured as lb-PM10/ton processed) from the Dustex dust collectors serving the Damrow Tower dryer shall be conducted on an annually basis. [District Rule 1081] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
17. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
22. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. 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] Federally Enforceable Through Title V Permit
25. The permittee shall monitor and record the differential operating pressure for each dust collector on each day that each dust collector operates. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of all maintenance of each dust collector, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
29. During each day of operation, the permittee shall record the differential pressure of each dust collector and compare the readings with the permitted range. If the differential pressure for each dust collector falls outside the permitted range, the permittee shall take all necessary steps to return the differential pressure for each dust collector to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. For the Dustex model 3610-14-34 dust collectors, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
31. For the Dustex model 3610-14-34 dust collectors, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Dustex model 3610-14-34 dust collectors, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR Part 64] Federally Enforceable Through Title V Permit
34. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-4-5

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
2. The boiler shall be fired only on PUC-quality natural gas or propane as a backup fuel. [District Rules 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
3. This boiler shall only be fired on propane during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
4. Emissions shall not exceed any of the following levels: 0.0109 lb NOx/MMBtu, (or 9 ppmvd NOx at 3% O2), 0.0042 lb VOC/MMBtu (or 10 ppmvd VOC at 3% O2), 0.00285 lb SOx/MMBtu, 0.037 lb CO/MMBtu (or 50 ppmvd CO at 3% O2), or 0.0076 lb PM10/MMBtu. [District Rules 2201, 4306, and 4320] Federally Enforceable Through Title V Permit
5. The combined annual emissions of permit unit C-402-4 shall not exceed any of the following limits: 5,825 lb NOx/yr, 1,630 lb SOx/yr, 4061 lb PM10/yr, 19,771 lb CO/yr, or 2,244 lb VOC/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Source testing to demonstrate compliance with NOx and CO limitations shall be conducted as required by District Rule 4305. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
7. Source testing to demonstrate compliance with NOx and CO emission limits shall be conducted not less than once every 12 months. Upon demonstrating compliance on two consecutive source tests, the following source test may be deferred for up to thirty-six months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
8. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
9. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
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 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. Source testing to measure concentrations of oxides of nitrogen (as NO<sub>2</sub>) shall be conducted using EPA method 7E or CARB method 100. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
14. Source testing to measure concentrations of carbon monoxide (CO) shall be conducted using EPA method 10 or CARB method 100. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
15. Source testing to measure the stack gas oxygen shall be conducted using EPA methods 3 or 3A, or CARB method 100. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
16. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO, and O<sub>2</sub> at least once every month 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 1 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. If the NO<sub>x</sub> and/or CO concentrations corrected to 3% 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 Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. If the unit is fired on propane for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NO<sub>x</sub> at least once during that year using an APCO approved portable NO<sub>x</sub> analyzer. Monitoring for propane fuel combustion NO<sub>x</sub> emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on propane fuel solely to perform monitoring. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Propane fuel combustion NO<sub>x</sub> 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. 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 3% 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 Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. If the unit is fired on propane fuel during a PUC-quality natural gas curtailment period, the permittee shall maintain records of: (1) the sulfur content of the fuel, (2) the amount of fuel used, and (3) the duration of the natural gas curtailment period. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line of the unit to monitor annual propane fuel usage or shall monitor annual propane fuel usage from utility service meters, purchase or tank fill records, or other acceptable method, as approved by the APCO. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The permittee shall determine the sulfur content of combusted gas annually and shall maintain records of the fuel sulfur content or shall maintain records of fuel purchase contracts, supplier certifications, tariff sheets, or transportation contracts demonstrating that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081, 2520, and 4320] Federally Enforceable Through Title V Permit
25. Determination of total sulfur as hydrogen sulfide (H<sub>2</sub>S) content shall be determined by EPA Method 11 or EPA Method 15, as appropriate. [District Rule 2520] Federally Enforceable Through Title V Permit
26. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall maintain records of all equipment maintenance. [District Rule 2520] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4320] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of the cumulative annual hours of operation on propane fuel and indicate the purpose for operation on propane fuel (i.e. natural gas curtailment, testing, maintenance, etc.). [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. All required records shall be retained on the premises for a minimum of 5 years and shall be made available for District inspection upon request. [District Rules 2201, 4306, and 4320] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-5-6

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

20.0 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. The permittee shall operate a nonresettable elapsed operating time meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 4101 and 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The Marriot-Walker dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
8. The operating schedule of this milk spray dryer shall not exceed 6,760 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Dry milk powder production for this dryer shall not exceed a total of 90.0 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions from the Marriot-Walker Milk Spray Dryer shall not exceed 0.606 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NOx @ 19% O2 (equivalent to 0.0606 lb-NOx/MMBtu), 0.003 lb-SOx/MMBtu, 42 ppmvd CO @ 19% O2 (equivalent to 0.29 lb-CO/MMBtu), or 0.0046 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 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
13. Source testing to measure NO<sub>x</sub> and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
14. Source testing to measure PM<sub>10</sub> emissions (measured as lb-PM<sub>10</sub>/ton processed) from the baghouse serving the Marriot-Walker Milk Spray Dryer shall be conducted on an annually basis. [District Rule 1081] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
16. 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] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure concentrations of PM<sub>10</sub> shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. 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] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
26. 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] Federally Enforceable Through Title V Permit
27. The permittee shall monitor and record differential operating pressure of the baghouse on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of annual hours of operation of the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
29. The permittee shall records of all maintenance of the baghouse, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
31. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
32. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. For the Marriot-Walker baghouse, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
34. For the Marriot-Walker baghouse, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
35. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Marriot-Walker baghouses, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
36. The permittee shall maintain records of baghouse maintenance, inspections, and repair. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Visible emissions from the baghouse shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-6-8

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

20.0 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES

## PERMIT UNIT REQUIREMENTS

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1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Each baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from each baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 4101 and 2201] Federally Enforceable Through Title V Permit
5. Each baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The Niro Atomizer dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. Dry milk powder production for this dryer shall not exceed a total of 144.0 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the Niro Atomizer Dryer shall not exceed 0.309 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NOx @ 19% O2 (equivalent to 0.0606 lb-NOx/MMBtu), 0.003 lb-SOx/MMBtu, 22 ppmvd CO @ 19% O2 (equivalent to 0.1525 lb-CO/MMBtu), or 0.033 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 and 4309] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
11. Source testing to measure NOx and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Source testing to measure PM<sub>10</sub> emissions (measured as lb-PM<sub>10</sub>/ton processed) from the two baghouses serving the Niro Atomizer dryer shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
14. 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] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
17. Source testing to measure concentrations of PM<sub>10</sub> shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. 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] Federally Enforceable Through Title V Permit
21. 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] Federally Enforceable Through Title V Permit
22. 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] Federally Enforceable Through Title V Permit
23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. 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] Federally Enforceable Through Title V Permit
25. The permittee shall monitor and record the differential operating pressure for each baghouse on each day that each baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of all maintenance of the baghouse, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
29. During each day of operation, the permittee shall record the differential pressure of each baghouses and compare the readings with the permitted range. If the differential pressure of each baghouse falls outside the permitted range, the permittee shall take all necessary steps to return the differential pressure of each baghouse to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. For each baghouse, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
31. For each baghouse, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the baghouses, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of dust collector maintenance, inspections, and repair. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR Part 64] Federally Enforceable Through Title V Permit
34. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-10-3

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS A BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM WITH O2 CONTROLLER

## PERMIT UNIT REQUIREMENTS

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1. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall maintain records of all equipment maintenance. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
3. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100] Federally Enforceable Through Title V Permit
4. The boiler shall be fired only on PUC-quality natural gas or propane as a backup fuel. [District Rules 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
5. This boiler shall only be fired on propane during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. The flue gas recirculation (FGR) system shall be operated in accordance with the manufacturer's specifications whenever the boiler is operating. A copy of the specifications shall be retained on site and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The acceptable range for readings of the variable-speed drive controlling the flue gas recirculation fan shall be established by correlating drive readings and emissions from this unit during the startup source test. This correlation shall be posted by the drive readout. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
8. Emissions shall not exceed any of the following; 9 ppmv NOx @ 3% O2 (0.011 lb NOx/MMBtu), 34 ppmv CO @ 3% O2 (0.0253 lb CO/MMBtu), 0.013 lb PM10/MMBtu, 0.0006 lb SOx/MMBtu, or 0.006 lb VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
9. The variable speed FGR fan readings shall be inspected at least on a daily basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
10. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
15. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. Source testing to measure CO emissions (ppmv) shall be conducted using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the date and time of the flue gas recirculation fan readings. The records must also include a description of any corrective action taken to maintain the flue gas recirculation fan reading to within the acceptable rate. These records shall be retained at the facility for a period of no less than 2 years and shall be made available for District inspection on request. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. If the FGR fan reading deviates from the acceptable range, the permittee shall notify the District and take corrective action with one (1) hour of detection. If the flue gas recirculation fan readings are not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emissions limits at the observed flue gas recirculation fan readings. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. If the unit is fired on propane for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NO<sub>x</sub> at least once during that year using an APCO approved portable NO<sub>x</sub> analyzer. Monitoring for propane fuel combustion NO<sub>x</sub> emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on propane fuel solely to perform monitoring. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. Propane fuel combustion NO<sub>x</sub> 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. 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 3% 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. If the unit is fired on propane fuel during a PUC-quality natural gas curtailment period, the permittee shall maintain records of: (1) the sulfur content of the fuel, (2) the amount of fuel used, and (3) the duration of the natural gas curtailment period. [District Rule 4320] Federally Enforceable Through Title V Permit
26. The permittee shall determine the sulfur content of combusted gas annually and shall maintain records of the fuel sulfur content or shall maintain records of fuel purchase contracts, supplier certifications, tariff sheets, or transportation contracts demonstrating that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081, 2520, and 4320] Federally Enforceable Through Title V Permit
27. Determination of total sulfur as hydrogen sulfide (H<sub>2</sub>S) content shall be determined by EPA Method 11 or EPA Method 15, as appropriate. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4320] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of the cumulative annual hours of operation on propane fuel and indicate the purpose for operation on propane fuel (i.e. natural gas curtailment, testing, maintenance, etc.). [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. The permittee shall record and maintain records of the amount of fuel combusted during each operating day. [40 CFR 60.48c(g)(1)] Federally Enforceable Through Title V Permit
31. All required records shall be retained on the premises for a minimum of 5 years and shall be made available for District inspection upon request. [District Rules 2201, 4306, and 4320] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-11-2

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6625 (f)] Federally Enforceable Through Title V Permit
2. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
3. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 16 hours per year. [District Rules 2201 and 4702, and 40 CFR 63.6640 (f)(ii)] Federally Enforceable Through Title V Permit
4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
6. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6655(a)(2) and (a)(5)] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
8. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
12. NOx emissions shall not exceed 5.4 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM10 emissions shall not exceed 0.2 g/hp-hr. [District Rule 4201] Federally Enforceable Through Title V Permit
14. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6660] Federally Enforceable Through Title V Permit
15. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)] Federally Enforceable Through Title V Permit
16. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63.6585/63.6595 (a)] Federally Enforceable Through Title V Permit
17. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63.6603/63.6640 Table 2d, Row 4.a] Federally Enforceable Through Title V Permit
18. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603/63.6640 Table 2d, Row 4.b] Federally Enforceable Through Title V Permit
19. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603/63.6640 Table 2d, Row 4.c] Federally Enforceable Through Title V Permit
20. The permittee shall keep records of the maintenance conducted on the engine. [40 CFR 63.6655(e)] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-13-2

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

START-UP HOPPER SERVED BY AN 18,900 CFM DONALDSON TORIT MODEL DFT 3-24 DUST COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the dust collector serving the start up hopper operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement filters numbering at least 10% of the total number of filters shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The dust collector shall operate at all times with a minimum differential pressure of 0.0 inches water column and a maximum differential pressure of 4.5 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall monitor and record the differential operating pressure on each day that the dust collector operates. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions from dust collector shall not exceed 0.073 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The maximum amount of product throughput shall not exceed 5.5 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of all maintenance of the dust collector, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall maintain daily records of the amount of milk powder (in tons) produced. The records shall be retained for at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Fresno County Rule 107] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520]  
Federally Enforceable Through Title V Permit
15. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-14-3

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

BAGGING OPERATION INCLUDING AN AVAPAC RECEIVER AND A TOTE RECEIVER ALL SERVED BY AN 18,900 CFM DONALDSON TORIT MODEL DFT 3-24 DUST COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the dust collector serving the packaging operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement filters numbering at least 10% of the total number of filters shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The dust collector shall operate at all times with a minimum differential pressure of 1.5 inches water column and a maximum differential pressure of 6.0 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall monitor and record the differential operating pressure on each day that the dust collector operates. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions from dust collector shall not exceed 0.003 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The total amount of product bagged in bags and totes shall not exceed 318.0 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of all maintenance of the dust collector, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall maintain daily records of the amount of milk powder (in tons) produced. The records shall be retained for at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Fresno County Rule 107] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520]  
Federally Enforceable Through Title V Permit
15. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-15-6

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

12,000-GALLON POWDER MILK STORAGE SILO #1 SERVED BY A SOCK FILTER

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the sock filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from sock filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475.0 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall maintain daily records of the amount of milk powder (in tons) transferred into the silo. The records shall be retained for at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
7. Visible emissions from the sock filter shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that silo #1 is loaded. If visible emissions are observed, corrective action shall be taken prior to further operation of the equipment. Corrective action means that visible emissions are eliminated before operation of the equipment is resumed. [40 CFR Part 64.3] Federally Enforceable Through Title V Permit
8. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
10. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
11. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7 (d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-16-6

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

12,000-GALLON POWDER MILK STORAGE SILO #2 SERVED BY BIN VENT FILTER

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the bin vent filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from bin vent filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475.0 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall maintain daily records of the amount of milk powder (in tons) transferred into the silo. The records shall be retained for at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
7. Visible emissions from the bin vent filter shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that silo #2 is loaded. If visible emissions are observed, corrective action shall be taken prior to further operation of the equipment. Corrective action means that visible emissions are eliminated before operation of the equipment is resumed. [40 CFR Part 64.3] Federally Enforceable Through Title V Permit
8. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
10. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
11. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7 (d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-17-5

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

30,000-GALLON POWDER MILK STORAGE SILO #3 SERVED BY BIN VENT FILTER

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the bin vent filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from bin vent filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475.0 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall maintain daily records of the amount of milk powder (in tons) transferred into the silo. The records shall be retained for at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
7. Visible emissions from the bin vent filter shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that silo #3 is loaded. If visible emissions are observed, corrective action shall be taken prior to further operation of the equipment. Corrective action means that visible emissions are eliminated before operation of the equipment is resumed. [40 CFR Part 64.3] Federally Enforceable Through Title V Permit
8. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
9. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
10. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-18-5

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

30,000 GALLON POWDER MILK STORAGE SILO #4 SERVED BY BIN VENT FILTER

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the bin vent filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from sock filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475.0 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall maintain daily records of the amount of milk powder (in tons) transferred into the silo. The records shall be retained for at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
7. Visible emissions from the bin vent filter shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that silo #4 is loaded. If visible emissions are observed, corrective action shall be taken prior to further operation of the equipment. Corrective action means that visible emissions are eliminated before operation of the equipment is resumed. [40 CFR Part 64.3] Federally Enforceable Through Title V Permit
8. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
9. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
10. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7 (d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-19-5

**EXPIRATION DATE:** 01/31/2021

**EQUIPMENT DESCRIPTION:**

30,000 GALLON POWDER MILK STORAGE SILO #5 SERVED BY BIN VENT FILTER

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the bin vent filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from sock filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475.0 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall maintain daily records of the amount of milk powder (in tons) transferred into the silo. The records shall be retained for at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
7. Visible emissions from the bin vent filter shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that silo #5 is loaded. If visible emissions are observed, corrective action shall be taken prior to further operation of the equipment. Corrective action means that visible emissions are eliminated before operation of the equipment is resumed. [40 CFR Part 64.3] Federally Enforceable Through Title V Permit
8. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
9. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
10. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7 (d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-402-0-1

EXPIRATION DATE: 01/31/2016

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and Fresno County Rule 110] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; Fresno County Rule 110] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: CALIFORNIA DAIRIES, INC.  
Location: 755 F ST, FRESNO, CA 93706-3415  
C-402-0-1 Sep 8 2016 3:58PM - GILLESR

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
40. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
41. On August 31, 2012, the initial Title V permit was issued. [District Rule 2520] Federally Enforceable Through Title V Permit
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin August 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-2-5

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

28.0 MMBTU/HR NATURAL GAS/LPG FIRED DAMROW COMPANY MODEL CCT-85-20X40 TOWER DRYER WITH A MAXON RC-NP-1 BURNER SERVED BY TWO DUSTEX DUST COLLECTORS MODEL 3610-14-34

## PERMIT UNIT REQUIREMENTS

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1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 4101 and 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 0.0 inches water column and a maximum differential pressure of 5.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The Damrow Tower dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. Dry milk powder production for this dryer shall not exceed a total of 120 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the Dustex Dust collectors serving the Damrow Tower dryer shall not exceed 0.344 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NOx @ 19% O2 (equivalent to 0.0606 lb-NOx/MMBtu), 0.003 lb-SOx/MMBtu, 11 ppmvd CO @ 19% O2 (equivalent to 0.0764 lb-CO/MMBtu), or 0.11 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 and 4309] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
11. Source testing to measure NOx and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Source testing to measure PM10 emissions (measured as lb-PM10/ton processed) from the Dustex Dust collectors serving the Damrow Tower dryer shall be conducted on an annually basis. [District Rule 1081] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
17. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
22. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



24. 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] Federally Enforceable Through Title V Permit
25. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
28. 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, 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
29. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. For the Dustex model 3610-14-34 baghouses, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
31. For the Dustex model 3610-14-34 baghouses, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Dustex model 3610-14-34 baghouses, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR 64] Federally Enforceable Through Title V Permit
34. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-4-4

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
2. The boiler shall be fired only on natural gas or propane as a backup fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
3. This boiler shall only be fired on propane during natural gas curtailment for no more than 336 cumulative hours in a calendar year with 48 hours per calendar year for equipment testing. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
4. Emissions shall not exceed any of the following levels: 0.0109 lb NOx/MMBtu, (or 9 ppmvd NOx at 3% O2), 0.0042 lb VOC/MMBtu (or 10 ppmvd VOC at 3% O2) , 0.00285 lb SOx/MMBtu, 0.037 lb CO/MMBtu (or 50 ppmvd CO at 3% O2), or 0.0076 lb PM10/MMBtu. [District Rules 2201 and 4306] Federally Enforceable Through Title V Permit
5. The combined annual emissions of permit unit C-402-4 shall not exceed any of the following limits: 5,825 lb NOx/yr, 1,630 lb SOx/yr, 4061 lb PM10/yr, 19,771 lb CO/yr, or 2,244 lb VOC/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Source testing to demonstrate compliance with NOx and CO limitations shall be conducted as required by District Rule 4305. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
7. Source testing to demonstrate compliance with NOx and CO emission limits shall be conducted not less than once every 12 months. Upon demonstrating compliance on two consecutive source tests, the following source test may be deferred for up to thirty-six months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
8. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
9. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
10. Source testing to measure concentrations of oxides of nitrogen (as NO2) shall be conducted using EPA method 7E or CARB method 100. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
11. Source testing to measure concentrations of carbon monoxide (CO) shall be conducted using EPA method 10 or CARB method 100. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Source testing to measure the stack gas oxygen shall be conducted using EPA methods 3 or 3A, or CARB method 100. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
13. Source testing to measure concentrations of volatile organic compounds (VOC) shall be conducted using EPA methods 18 or 25 or CARB method 100. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Source testing to measure concentrations of oxides of sulfur (SOx) as SO2 shall be conducted using EPA methods 6 or 8, or CARB method 100. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Source testing to measure concentrations of PM10 shall be conducted using EPA methods 201 and 202, or EPA methods 201A and 202, or CARB method 501 in conjunction with CARB method 5. [District Rule 2201] Federally Enforceable Through Title V Permit
16. In lieu of performing a source test for PM10, the results of a total particulate test may be used for compliance with the PM10 limit. If this option is used, then all of the particulate matter emissions will be considered to be PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to measure the concentration of total particulate emissions shall be conducted using CARB method 5. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every month 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 1 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. If the NOx and/or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. Permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line of the unit to monitor annual propane fuel usage or shall monitor annual propane fuel usage from utility service meters, purchase or tank fill records, or other acceptable method, as approved by the APCO. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Permittee shall monitor and record the cumulative annual hours of operation when fired on propane during curtailment and testing. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. All required records shall be retained on the premises for a minimum of 5 years and shall be made available for District inspection upon request. [District Rule 2201 and 4306] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-5-5

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

20 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. The permittee shall operate a nonresettable elapsed operating time meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 4101 and 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The Marriot-Walker dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
8. The operating schedule of this milk spray dryer shall not exceed 6,760 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Dry milk powder production for this dryer shall not exceed a total of 90 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions from the Marriot-Walker Milk Spray Dryer shall not exceed 0.606 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NOx @ 19% O2 (equivalent to 0.0606 lb-NOx/MMBtu), 0.003 lb-SOx/MMBtu, 42 ppmvd CO @ 19% O2 (equivalent to 0.29 lb-CO/MMBtu), or 0.0046 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 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
13. Source testing to measure NO<sub>x</sub> and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
14. Source testing to measure PM<sub>10</sub> emissions (measured as lb-PM<sub>10</sub>/ton processed) from the baghouse serving the Marriot-Walker Milk Spray Dryer shall be conducted on an annually basis. [District Rule 1081] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
16. 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] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure concentrations of PM<sub>10</sub> shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. 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] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
26. 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] Federally Enforceable Through Title V Permit
27. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of annual hours of operation of the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
31. 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, 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
32. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. For the Marriot-Walker baghouses, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
34. For the Marriot-Walker baghouses, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
35. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Marriot-Walker baghouses, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR 64] Federally Enforceable Through Title V Permit
37. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-6-7

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

20 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES

## PERMIT UNIT REQUIREMENTS

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1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 4101 and 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The Niro Atomizer dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. Dry milk powder production for this dryer shall not exceed a total of 144 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the Niro Atomizer Dryer shall not exceed 0.309 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NO<sub>x</sub> @ 19% O<sub>2</sub> (equivalent to 0.0606 lb-NO<sub>x</sub>/MMBtu), 0.003 lb-SO<sub>x</sub>/MMBtu, 22 ppmvd CO @ 19% O<sub>2</sub> (equivalent to 0.1525 lb-CO/MMBtu), or 0.033 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 and 4309] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
11. Source testing to measure NO<sub>x</sub> and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Source testing to measure PM10 emissions (measured as lb-PM10/ton processed) from the two baghouses serving the Niro Atomizer dryer shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
17. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
22. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



24. 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] Federally Enforceable Through Title V Permit
25. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
28. 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, 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
29. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. For the baghouses, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
31. For the baghouses, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the baghouses, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR 64] Federally Enforceable Through Title V Permit
34. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-10-2

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O2 CONTROLLER

## PERMIT UNIT REQUIREMENTS

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1. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100] Federally Enforceable Through Title V Permit
4. The boiler shall be fired on PUC quality natural gas or propane. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Propane shall be used as a backup fuel and may be fired during times of natural gas curtailment no more than 336 cumulative hours in a calendar year plus 48 hours per calendar year as required for equipment testing. [District Rule 1070] Federally Enforceable Through Title V Permit
6. The flue gas recirculation (FGR) system shall be operated in accordance with the manufacturer's specifications whenever the boiler is operating. A copy of the specifications shall be retained on site and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The acceptable range for readings of the variable-speed drive controlling the flue gas recirculation fan shall be established by correlating drive readings and emissions from this unit during the startup source test. This correlation shall be posted by the drive readout. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
8. Emissions shall not exceed any of the following; 9 ppmv NOx @ 3% O2 (0.011 lb NOx/MMBtu), 34 ppmv CO @ 3% O2 (0.0253 lb CO/MMBtu), 0.013 lb PM10/MMBtu, 0.0006 lb SOx/MMBtu, or 0.006 lb VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
9. The variable speed flue gas recirculation fan readings shall be inspected at least on a daily basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
10. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
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, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. Source testing to measure CO emissions (ppmv) shall be conducted using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
15. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of the date and time of the flue gas recirculation fan readings. The records must also include a description of any corrective action taken to maintain the flue gas recirculation fan reading to within the acceptable rate. These records shall be retained at the facility for a period of no less than 2 years and shall be made available for District inspection on request. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. If the flue gas recirculation fan reading deviates from the acceptable range, the permittee shall notify the District and take corrective action with one (1) hour of detection. If the flue gas recirculation fan readings are not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emissions limits at the observed flue gas recirculation fan readings. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. Permittee shall maintain accurate annual records of propane use in cumulative hours, and such records shall be made readily available for District inspection upon request for a period of five years. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. The owner or operator shall record and maintain records of the amount of fuel combusted during each operating day. [40 CFR 60.48c(g)(1)] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-11-1

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6625 (f)] Federally Enforceable Through Title V Permit
2. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
3. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 16 hours per year. [District Rules 2201 and 4702, and 40 CFR 63.6640 (f)(ii)] Federally Enforceable Through Title V Permit
4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
6. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6655(a)(2) and (a)(5)] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
8. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
12. NOx emissions shall not exceed 5.4 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM10 emissions shall not exceed 0.2 g/hp-hr. [District Rule 4201] Federally Enforceable Through Title V Permit
14. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6660] Federally Enforceable Through Title V Permit
15. On and after May 3, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)] Federally Enforceable Through Title V Permit
16. On and after May 3, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63.6585/63.6595 (a)] Federally Enforceable Through Title V Permit
17. On and after May 3, 2013, the engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63.6603/63.6640 Table 2d, Row 4.a] Federally Enforceable Through Title V Permit
18. On and after May 3, 2013, the engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603/63.6640 Table 2d, Row 4.b] Federally Enforceable Through Title V Permit
19. On and after May 3, 2013, the engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603/63.6640 Table 2d, Row 4.c] Federally Enforceable Through Title V Permit
20. On and after May 3, 2013, the permittee shall keep records of the maintenance conducted on the engine. [40 CFR 63.6655(e)] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-402-13-1

EXPIRATION DATE: 01/31/2016

## EQUIPMENT DESCRIPTION:

START-UP HOPPER SERVED BY A DONALDSON TORIT DUST COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the dust collector serving the start up hopper operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse shall operate at all times with a minimum differential pressure of 0.0 inches water column and a maximum differential pressure of 4.5 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions from dust collector shall not exceed 0.073 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The maximum amount of product throughput shall not exceed 5.5 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records of the amount of daily milk powder (in tons) process shall be maintained, retained for at least five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, and Fresno County Rule 107] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
15. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-14-2

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

BAGGING OPERATION INCLUDING AN AVAPAC RECEIVER AND A TOTE RECEIVER ALL SERVED BY A DONALDSON MODEL DFT 3-24 DUST COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the dust collector serving the packaging operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse shall operate at all times with a minimum differential pressure of 1.5 inches water column and a maximum differential pressure of 6.0 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions from dust collector shall not exceed 0.003 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The total amount of product bagged in bags and totes shall not exceed 318 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records of the amount of daily milk powder (in tons) process shall be maintained, retained for at least five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, and Fresno County Rule 107] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



14. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520]  
Federally Enforceable Through Title V Permit
15. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-15-4

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

12,000-GALLON POWDER MILK STORAGE SILO #1 SERVED BY A SOCK FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15, '-16, '-17, '-18, & '-19)

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the sock filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from sock filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Records of the amount of daily milk powder (in tons) process shall be maintained, retained for at least five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-16-4

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

12,000-GALLON POWDER MILK STORAGE SILO #2 SERVED BY BIN VENT FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15, '-16, '-17, '-18, & '-19)

## PERMIT UNIT REQUIREMENTS

---

1. Visible emissions from the bin vent filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from bin vent filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Records of the amount of daily milk powder (in tons) process shall be maintained, retained for at least five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-17-4

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

30,000-GALLON POWDER MILK STORAGE SILO #3 SERVED BY BIN VENT FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15, '-16, '-17, '-18, & '-19)

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the bin vent filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from bin vent filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Records of the amount of daily milk powder (in tons) process shall be maintained, retained for at least five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from the bin vent filter shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that silo #3 is loaded. If visible emissions are observed, corrective action shall be taken prior to further operation of the equipment. Corrective action means that visible emissions are eliminated before operation of the equipment is resumed. [40 CFR 64.3] Federally Enforceable Through Title V Permit
8. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
9. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
10. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7 (d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-18-4

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

30,000 GALLON POWDER MILK STORAGE SILO #4 SERVED BY BIN VENT FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15, '-16, '-17, '-18, & '-19)

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the bin vent filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from sock filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Records of the amount of daily milk powder (in tons) process shall be maintained, retained for at least five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from the bin vent filter shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that silo #4 is loaded. If visible emissions are observed, corrective action shall be taken prior to further operation of the equipment. Corrective action means that visible emissions are eliminated before operation of the equipment is resumed. [40 CFR 64.3] Federally Enforceable Through Title V Permit
8. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
9. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
10. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7 (d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-402-19-4

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

30,000 GALLON POWDER MILK STORAGE SILO #5 SERVED BY BIN VENT FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15,'-16, '-17, '-18, & '-19)

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the bin vent filter serving the storage silo operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from sock filter shall not exceed 0.012 lb/ton of product transferred to silo. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total PM10 emissions from silos C-402-15, '-16, '-17, '-18 & '-19 combined shall not exceed 5.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The amount of product transferred to silos C-402-15, '-16, '-17, '-18 & '-19 shall not exceed 475 tons combined in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Records of the amount of daily milk powder (in tons) process shall be maintained, retained for at least five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from the bin vent filter shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that silo #5 is loaded. If visible emissions are observed, corrective action shall be taken prior to further operation of the equipment. Corrective action means that visible emissions are eliminated before operation of the equipment is resumed. [40 CFR 64.3] Federally Enforceable Through Title V Permit
8. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
9. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
10. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7 (d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT C

Detailed Facility List

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**Detailed Facility Report**  
For Facility=402 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

CALIFORNIA DAIRIES, INC. 765 F ST FRESNO, CA 93706-3416	FAC # STATUS: TELEPHONE:	C 402 A	TYPE: TOXIC ID:	TitleV 40083	EXPIRE ON: AREA: INSP. DATE:	01/31/2016 7/ 04/16
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-402-2-5	28 MMBTU/HR DRYER	3020-02 H	1	1,080.00	1,080.00	A	28.0 MMBTU/HR NATURAL GAS/LPG FIRED DAMROW COMPANY MODEL CCT-85-20X40 TOWER DRYER WITH A MAXON RC-NP-1 BURNER SERVED BY TWO DUSTEX DUST COLLECTORS MODEL 3610-14-34
C-402-4-4	61,000 KBTU/HR	3020-02 H	1	1,080.00	1,080.00	A	61.0 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH NATURAL GAS OR PROPANE-AIRMIX-FIRED NATCOM HYPER-MIX MODEL P-61-G-26-1519 ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM
C-402-5-5	20.0 MMBTU/HR DRYER	3020-02 H	1	1,080.00	1,080.00	A	20 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE
C-402-6-7	20.0 MMBTU/HR DRYER	3020-02 H	1	1,080.00	1,080.00	A	20 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES
C-402-10-2	67 MMBTU/HR BOILER	3020-02 H	1	1,080.00	1,080.00	A	67.0 MMBTU/HR CLEAVER BROOKS MODEL DL-60 NATURAL GAS-FIRED BOILER WITH PROPANE AS SUPPLEMENTAL OR BACK-UP FUEL WITH TODD DRMB ULTRA LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION WITH O2 CONTROLLER
C-402-11-1	2,220 BHP IC ENGINE	3020-10 F	1	785.00	785.00	A	2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR
C-402-13-1	10 BHP ELECTRIC MOTOR RATING	3020-01 A	1	92.00	92.00	A	START-UP HOPPER SERVED BY A DONALDSON TORIT DUST COLLECTOR
C-402-14-2	30 BHP ELECTRIC MOTOR RATING	3020-01 B	1	123.00	123.00	A	BAGGING OPERATION INCLUDING AN AVAPAC RECEIVER AND A TOTE RECEIVER ALL SERVED BY A DONALDSON MODEL DFT 3-24 DUST COLLECTOR
C-402-15-4	12,000 Gallon Storage Tank	3020-05 B	1	98.00	98.00	A	12,000-GALLON POWDER MILK STORAGE SILO #1 SERVED BY A SOCK FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15,-16, '-17, '-18, & '-19)
C-402-16-4	12,000 Gallon Storage Tank	3020-05 B	1	98.00	98.00	A	12,000-GALLON POWDER MILK STORAGE SILO #2 SERVED BY BIN VENT FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15,-16, '-17, '-18, & '-19)
C-402-17-4	30,000 Gallon Storage Tank	3020-05 C	1	142.00	142.00	A	30,000-GALLON POWDER MILK STORAGE SILO #3 SERVED BY BIN VENT FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15,-16, '-17, '-18, & '-19)
C-402-18-4	30,000 Gallon Storage Tank	3020-05 C	1	142.00	142.00	A	30,000 GALLON POWDER MILK STORAGE SILO #4 SERVED BY BIN VENT FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15,-16, '-17, '-18, & '-19)



**Detailed Facility Report**  
For Facility=402 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-402-19-4	30,000 Gallon Storage Tank	3020-05 C	1	142.00	142.00	A	30,000 GALLON POWDER MILK STORAGE SILO #5 SERVED BY BIN VENT FILTER (DAILY THROUGHPUT LIMIT SHARED WITH PERMIT UNITS '-15,'-16, '-17, '-18, & '-19)

Number of Facilities Reported: 1

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# ATTACHMENT D

EPA Comments and District Responses

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## **EPA Comments and District Responses**

### **EPA Comment 1:**

The Renewal Evaluation states on page 1 that the previous Title V permit was issued on August 31, 2012. This means that a timely renewal application would be due between February 29, 2016 and February 28, 2017. However, the application was deemed complete on February 27, 2015, which is more than 1 year earlier than required. Thus the submittal of these applications violated Section 5.2 of Rule 2520. Pursuant to Section 8.3, unless a timely and complete renewal application has been submitted consistent with the requirements of Section 5.2, the permit expires on its stated expiration date, and the provision allowing a current permit to remain in effect while a renewal permit is being processed does not apply. Accordingly, the permit renewal must be issued no later than the current permit expiration date of August 31, 2017, otherwise the source will be operating without a valid Title V permit.

### **District Response 1:**

The expiration date for this facility is not based on a 5 year period from the date of issuance of the Initial Title V Permit to Operate. The permit expiration date for this facility is January 31, 2016, which means that a timely application was due between July 31, 2014 and July 31, 2015. The submittal of a complete application on February 27, 2015 meets the Rule 2520, section 5.2 requirement for a timely application (at least six months, but not greater than 18 months, prior to the permit expiration date).

### **EPA Comment 2:**

On page 7 of the Renewal Evaluation the District evaluates the requirements of Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators and Process heaters Greater than 5 MMBtu/hr. Under Section 4.0 – Exemptions, the evaluation states that the exemption provided in Section 4.2 applies to Permit units C-402-4 and '-10 because they are "permitted to operate on propane during [a] California PUC quality natural gas curtailment." It is not clear to EPA how burning propane during a natural gas (NG) curtailment ensures the source meets the stated Section 4.2 exemption requirements. Instead, it appears that Conditions 2, 3, 19 and 20 for Permit unit C-402-4 ensure that this exemption is applicable to the emission units during a California PUC quality NG curtailment. Please clarify in the evaluation that the Section 4.2 exemption is applicable during NG curtailments, not because the unit is limited to burning propane as a backup fuel, but because the cited conditions ensure the unit will operate within the parameters that allow this exemption to be applicable to the emissions unit.

Please revise the wording in Condition 3 for these units to clarify that 168 hours of operation are allowed during a NG curtailment, and an additional 48 hrs are allowed for equipment testing. The current wording implies that 48 of the 168 can be used for equipment testing. Please make these same revisions for Permit unit C-402-10.

**District Response 2:**

The Rule 4320, section 4.2 discussion (page 9 of the Renewal Evaluation) has been revised to clarify that the units meet the exemption criteria due to the inclusion of conditions on the permits that ensure each unit will be operated in compliance with the exemption criteria.

Additionally, the condition on each renewed Title V operating permit (condition 3 on C-402-4-5 and condition 5 on '-10-3) has been revised to clarify that the 48 hours of operation allowed for testing is in addition to the 168 hours of operation allowed for PUC-quality natural gas curtailment periods, per District Rule 4320, section 4.2.

**EPA Comment 3:**

On page 15 of the Renewal Evaluation the District evaluates the requirements of Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators and Process heaters Greater than 5 MMBtu/hr. Under Section 6.2 – Test Methods, the evaluation states that for Permit unit C-402-4, Conditions 13, 14, 15 and 16 have been removed from the Title V permit because there is no corresponding requirement to perform source testing for VOC, SOx or PM10, and that without a source test requirement, these conditions (specifying which source test methods are to be used during a source test) are not needed. EPA agrees that Rule 4320 does not require any compliance monitoring for these pollutants and the permit does not currently contain any requirement to perform source testing for these three pollutants. However, EPA notes that Condition 4 contains emission limits for all three of these pollutants and cites both Rule 2201 (NSR) and Rule 4306 as the basis for the condition. An underlying tenet of the Title V program is that the permit must ensure compliance with all applicable requirements. Rule 2520, Section 9.3.2 specifies that where periodic testing or monitoring is not required by the applicable requirement to demonstrate compliance, the permit shall contain periodic monitoring to yield reliable data for the relevant time period that are representative of the source's compliance with the permit.

Currently the permit does not specify how compliance with the stated emission limits will be determined. Compliance must be determined at least once during the term of the Title V permit or more frequently if appropriate. Requiring source testing to verify compliance with these emission limits once every five years would satisfy this requirement, but the District may also choose to specify other methods to verify compliance, such as using the sulfur content of the fuel to demonstrate compliance

with the SO<sub>x</sub> emission limit or using a portable monitor calibrated for the specific pollutants to verify compliance with the emission limits. Please revise the Renewal Evaluation to address the requirement of Rule 2520, Section 9.3.2, so that the Title V permit ensures compliance with all applicable requirements (in this case specified emission limits) and add any additional conditions to the permit as needed.

**District Response 3:**

The SO<sub>x</sub> emission factor on each permit is based on a conservatively high estimate of the sulfur content (1.0 gr/100 scf of gas). Since SO<sub>x</sub> emissions are a direct result of the sulfur compounds in the fuel, determining a SO<sub>x</sub> emission factor based on a conservative estimate of the fuel sulfur content results in a conservatively high SO<sub>x</sub> emission factor. Since PUC-quality natural gas and commercial propane are expected to contain lower sulfur content than estimated in the determination of the SO<sub>x</sub> emission factor, the use of these fuels ensures compliance with the SO<sub>x</sub> emission limit on each permit.

Additionally, PM<sub>10</sub> emissions from boilers are primarily the result of contaminants in the fuel. Since gaseous fuels typically contain very low concentrations of particulate contaminants, compliance with the PM<sub>10</sub> emission factor for gaseous fuel-fired boilers is ensured by the use of PUC-quality natural gas or commercial propane.

Therefore, the use of natural gas from a PUC-regulated source or propane from a FERC regulated source ensures compliance with both the SO<sub>x</sub> and PM<sub>10</sub> emission limits. If the owner/operator does not use propane from a FERC regulated source, the owner/operator may determine the fuel sulfur content annually using either EPA Method 11 or EPA Method 15. The owner/operator will be required to maintain records of fuel sulfur tests or maintain records that the fuel is provided from a PUC or FERC regulated source.

The renewal evaluation has been revised (page 7) to include a compliance discussion for Rule 2520, section 9.3.2 and conditions (#s 2, 24, and 25 on permit C-402-4 and #s 4, 26, and 27 on permit C-402-10) have either been revised or added to the renewed Title V operating permits as described in the renewal evaluation to ensure compliance with the SO<sub>x</sub>, PM<sub>10</sub>, and VOC emission limits on the permits. The revisions to the permits and to the evaluation satisfy the requirements of section 9.3.2 of Rule 2520 for the specified pollutants.