



NOV 28 2016

Mr. Thomas Williams
California Dairies, Inc
475 S Tegner Rd
Turlock, CA 95380

**Re: Notice of Final Action - Title V Permit Renewal
District Facility # N-2149
Project # N-1150560**

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

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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Final Title V Permit Renewal Evaluation
California Dairies, Inc
N-2149**

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TITLE V PERMIT RENEWAL EVALUATION

Milk Processing

Engineer: Robert Gilles
Date: September 8, 2016

Facility Number: N-2149
Facility Name: California Dairies, Inc
Mailing Address: 475 S Tegner Rd
Turlock, CA 95380

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

Responsible Official: Thomas Williams
Title: Director of Environmental Compliance

Project # : N-1150560
Deemed Complete: February 27, 2015

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 November 30, 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 475 S Tegner Rd in Turlock, 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. Since 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 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 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.

a. N-2149-1-4: POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7,500 SCFM

- Conditions 6, 11, and 12 have been added to the requirements for the draft renewed Title V operating permit to ensure proper operation, maintenance, and inspection of baghouses. These conditions are considered clarifications of the requirement for the permittee to maintain the baghouse in proper operating condition and per the manufacturer's recommendation.

b. N-2149-6-3: POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

- Conditions 5, 13, and 14 have been added to the requirements for the draft renewed Title V operating permit to ensure proper operation, maintenance, and inspection of baghouses. These conditions are considered clarifications of the requirement for the permittee to maintain the baghouse in proper operating condition and per the manufacturer's recommendation.

c. *N-2149-8-2: DRY MILK BLENDING OPERATION CONSISTING OF TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY A 4,250 CFM DONALDSON MODEL 2DF12 DUST COLLECTOR*

- Conditions 7, 11, and 12 have been added to the requirements for the draft renewed Title V operating permit to ensure proper operation, maintenance, and inspection of baghouses. These conditions are considered clarifications of the requirement for the permittee to maintain the baghouse in proper operating condition and per the manufacturer's recommendation.

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 N-2149-3 and permit unit '4 include emission limits for SO_x, PM₁₀, 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. *N-2149-3-8: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM*

- Condition 1 of the requirements for the draft renewed Title V operating permit replaces condition 1 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.
- Conditions 2 and 11 of the requirements for the draft renewed Title V operating permit replace conditions 1 and 2 of the requirements for the previous Title V operating permit and condition 12 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 SO_x and PM₁₀.

b. *N-2149-4-8: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER*

- Condition 1 of the requirements for the draft renewed Title V operating permit replaces condition 1 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.
- Conditions 2 and 11 of the requirements for the draft renewed Title V operating permit replace conditions 1 and 2 of the requirements for the previous Title V operating permit and condition 12 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 SO_x and PM₁₀.

E. District Rule 4702, Internal Combustion Engines

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SO_x) from internal combustion engines. This rule applies to any internal combustion engine rated at 25 brake horsepower or greater. Compliance with the requirements and provisions of this rule for permit unit N-2149-7 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. *N-2149-7-3: 2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING 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. Because 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.

F. **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. *N-2149-7-3: 2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR*

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

G. 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 N-2149-7 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. *N-2149-7-3: 2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING 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.

H. 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 _x	20,000
CO	200,000
PM ₁₀	140,000
SO _x	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 with CAM will be demonstrated in this Title V renewal.

- a. *N-2149-1-4: POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7,500 SCFM*

This permit unit may be subject to CAM for PM₁₀ since the unit has an emission limit for PM₁₀ and is equipped with add-on control for PM₁₀. 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,

$$\begin{aligned} \text{EF}_{\text{Controlled}} &= 0.0045 \text{ lb-PM}_{10}/\text{ton} \text{ (current PTO limit)} \\ \text{CE} &= \text{baghouse control efficiency; 99\% (District assumption)} \\ \text{Throughput} &= 400,000 \text{ lb-product/day (current PTO limit)} \end{aligned}$$

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= [0.0045 \text{ lb-PM}_{10}/\text{ton} \times (400,000 \text{ lb/day} \div 2,000 \text{ lb/ton}) \times 365 \text{ day/year}] \div (1-0.99) \\ &= 32,850 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is not greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is not subject to CAM for PM₁₀.

- b. *N-2149-2-8: 11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER*

This permit unit has emissions limits for NO_x, SO_x, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for NO_x, SO_x, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for PM₁₀ 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,

$\text{EF}_{\text{Controlled}}$ = 0.348 lb-PM₁₀/ton (current PTO limit)

CE = wet scrubber; 90% (District assumption)

Throughput = 106.6 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= [0.348 \text{ lb-PM}_{10}/\text{ton} \times 106.6 \text{ ton/day} \times 365 \\ &\text{day/year}] \div (1-0.90) \\ &= 135,403 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is not greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is not subject to CAM for PM₁₀.

- c. *N-2149-3-8: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM*

This permit unit has emissions limits for NO_x, SO_x, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for SO_x, PM₁₀, 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_x 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 ⁶ 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

$$\begin{aligned} \text{Pre-control PE NOx} &= (0.0085 \text{ lb-NOx/MMBtu} \times 60.6 \text{ MMBtu/hr} \times \\ &24 \text{ hr/day} \times 365 \text{ day/year}) \div (1-0.36) \\ &= 7,050 \text{ lb-NOx/year} \end{aligned}$$

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.

- b. *N-2149-4-8: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER*

This permit unit has emissions limits for NOx, SOx, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for SOx, PM₁₀, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for NOx 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.

$$\begin{aligned} \text{Pre-control PE NOx} &= (EF_{\text{Controlled}} \text{ lb-NOx/MMBtu} \times \text{Burner Rating,} \\ &\text{MMBtu/hr} \times \text{Operation, hr/day} \times 365 \\ &\text{day/year}) \div (1-CE) \end{aligned}$$

As shown previously, the use of FGR results in 36% reduction in NOx emissions. Therefore, the pre-control PE for this unit is calculated as follows:

$$\begin{aligned}\text{Pre-control PE NOx} &= (0.0085 \text{ lb-NOx/MMBtu} \times 60.7 \text{ MMBtu/hr} \times \\ &24 \text{ hr/day} \times 365 \text{ day/year}) \div (1-0.36) \\ &= 7,062 \text{ lb-NOx/year}\end{aligned}$$

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. *N-2149-5-5: 31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS*

This permit unit has emissions limits for NOx, SOx, PM₁₀, 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 PM₁₀ 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.

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

Where,

$$\begin{aligned}\text{EF}_{\text{Controlled}} &= 0.141 \text{ lb-PM}_{10}/\text{ton} \text{ (current PTO limit)} \\ \text{CE} &= \text{baghouses; } 99\% \text{ (District assumption)} \\ \text{Throughput} &= 228.0 \text{ ton-product/day (current PTO limit)}\end{aligned}$$

$$\begin{aligned}\text{Pre-control PE PM}_{10} &= [0.141 \text{ lb-PM}_{10}/\text{ton} \times 228.0 \text{ ton/day} \times 365 \\ &\text{ day/year}] \div (1-0.99) \\ &= 1,173,402 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is subject to CAM for PM₁₀.

- Conditions 35 through 41 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this regulation.

d. *N-2149-6-3: POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE*

This permit unit may be subject to CAM for PM₁₀ since the unit has an emission limit for PM₁₀ and is equipped with add-on control for PM₁₀. 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_{Controlled} = 0.0045 lb-PM₁₀/ton (current PTO limit)

CE = baghouse control efficiency; 99% (District assumption)

Throughput = 444.4 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.0045 \text{ lb-PM}_{10}/\text{ton} \times 444.4 \text{ ton/day} \times 365 \\ &\text{day/year}) \div (1-0.99) \\ &= 72,993 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is not greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is not subject to CAM for PM₁₀.

e. *N-2149-7-3: 2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR*

This permit unit has emissions limits for NO_x, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for these pollutants; therefore, this unit cannot be subject to CAM for these pollutants.

f. *N-2149-8-2: DRY MILK BLENDING OPERATION CONSISTING OF TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY A 4,250 CFM DONALDSON MODEL 2DF12 DUST COLLECTOR*

This permit unit may be subject to CAM for PM₁₀ since the unit has an emission limit for PM₁₀ and is equipped with add-on control for PM₁₀. 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,

$\text{EF}_{\text{Controlled}}$ = 0.00022 lb-PM₁₀/ton (current PTO limit)

CE = dust collector control efficiency; 99% (District assumption)

Throughput = 72.0 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.00022 \text{ lb-PM}_{10}/\text{ton} \times 72.0 \text{ ton/day} \times 365 \\ &\text{ day/year}) \div (1-0.99) \\ &= 578 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is not greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is not subject to CAM for PM₁₀.

I. 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. N-2149-0-3: Facility-Wide Requirements

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

J. 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. N-2149-0-3: Facility-Wide Requirements

- Condition 27 of the requirements for 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

ATTACHMENT A

Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-2149-0-3

EXPIRATION DATE: 11/30/2021

FACILITY-WIDE REQUIREMENTS

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

Facility Name: CALIFORNIA DAIRIES, INC.
Location: 475 S TEGNER RD, TURLOCK, CA 95380
N-2149-0-3, Nov 14 2016 11:36AM - GILLES

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 8051 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]
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: N-2149-1-4

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7,500 SCFM

PERMIT UNIT REQUIREMENTS

1. 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
2. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags shall be maintained on the premises. [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. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The differential pressure gauge reading range shall be established per manufacturer's recommendation at the next District inspection. [District Rule 2201]
7. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of product bagged shall not exceed 400,000.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
10. A daily log shall be maintained and shall include the total weight of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
13. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Stanislaus County Rule 107] Federally Enforceable Through Title V Permit
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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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: N-2149-2-8

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER

PERMIT UNIT REQUIREMENTS

1. The dryer shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
2. The dryer shall be equipped with a totalizing fuel flow meter which measures the quantity of natural gas consumed per day (in cubic feet). [District Rule 2201] Federally Enforceable Through Title V Permit
3. The wet scrubber sprays and/or nozzles shall be maintained in optimum working order. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All ducting from the drying operations to the wet scrubber shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heat input to the dryer shall not exceed 207.0 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The heat input to the dryer shall not exceed 70,445 MMBtu/year, calculated on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of powdered milk produced shall not exceed 106.6 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The NO_x emissions due to the combustion of natural gas shall not exceed 3.5 ppmv @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CO emissions due to the combustion of natural gas shall not exceed 11.37 ppmv @ 19% O₂ (equivalent to 0.084 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The SO_x emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The PM₁₀ emissions from the drying operation shall not exceed 0.348 lb/ton of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The combined PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

16. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted using EPA Method 5, or CARB 501/501A or any other District and EPA approved test method. [District Rule 2201] Federally Enforceable Through Title V Permit
20. 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
21. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. 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
25. 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
26. 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
27. 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
28. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

29. 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
30. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records which demonstrate the dryer is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
32. The permittee shall maintain a daily record, in MMBtu, of the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records on a 12-month rolling basis, in MMBtu, the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The permittee shall maintain a daily record, in pounds, of the quantity of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309] 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: N-2149-3-8

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM

PERMIT UNIT REQUIREMENTS

1. 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
2. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
4. The total PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, 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. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. If either the NO_x 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 show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. 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.

9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
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
11. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the combusted gas is provided from a PUC-regulated source. [District Rules 2520 and 4320] Federally Enforceable Through Title V Permit
12. Determination of total sulfur as hydrogen sulfide (H₂S) content shall be determined by EPA Method 11 or EPA Method 15, as appropriate. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO_x 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, 4306, and 4320] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. 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
21. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. 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: N-2149-4-8

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

1. 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
2. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
4. The total PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, 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. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. If either the NO_x 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 show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. 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.

9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
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
11. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the combusted gas is provided from a PUC-regulated source. [District Rules 2520 and 4320] Federally Enforceable Through Title V Permit
12. Determination of total sulfur as hydrogen sulfide (H₂S) content shall be determined by EPA Method 11 or EPA Method 15, as appropriate. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO_x 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, 4306, and 4320] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. 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
21. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. 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: N-2149-5-5

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS

PERMIT UNIT REQUIREMENTS

1. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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
5. Each baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from each baghouse serving the drying 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
7. All ducting from the drying operations to the baghouses shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The dryer shall only be fired on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The quantity of powdered milk produced shall not exceed 228.0 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The NO_x emissions due to the combustion of natural gas shall not exceed 4.81 ppmv @ 19% O₂ (equivalent to 0.055 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The CO emissions due to the combustion of natural gas shall not exceed 8.26 ppmv @ 19% O₂ (equivalent to 0.061 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The SO_x emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The PM₁₀ emissions from the dryer baghouses shall not exceed 0.141 lb/ton of powdered milk processed. [District Rule 2201] 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.

15. The combined PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Differential operating pressure of each baghouse shall be monitored and recorded on each day that each baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. 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
18. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
20. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
23. 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
24. 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
25. 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
26. 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
27. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records of the daily quantity of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of all maintenance of each baghouse, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309] Federally Enforceable Through Title V Permit
35. Each 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
36. During each day of operation, the permittee shall record the differential pressure of each baghouse 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 within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for each baghouse, 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
40. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR Part 64] Federally Enforceable Through Title V Permit
41. 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. [District Rule 2520 and 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: N-2149-6-3

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. 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
2. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
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. The differential pressure gauge reading range shall be established per manufacturer's recommendation at the next District inspection. [District Rule 2201]
6. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting from the bagging operation to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of product bagged shall not exceed 444.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The PM10 emission concentration shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of the daily quantity of powder milk bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of the combined daily quantity of PM10 emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The total PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
15. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070] 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.

16. 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
17. 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: N-2149-7-3

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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] Federally Enforceable Through Title V Permit
2. 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]
3. 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
4. Emissions shall not exceed any of the following: 6.9 g-NOx/bhp-hr; 1.4 g-CO/bhp-hr; or 1.0 g-VOC/bhp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed 0.4 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 13 CCR 2423, and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 21 hours per calendar year. [District Rules 2201 and 4702, and 40 CFR 63.6640 (f)(ii)] Federally Enforceable Through Title V Permit
9. 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
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. 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.), records of operational characteristics monitoring, and the sulfur content of the diesel fuel used. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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
18. 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: N-2149-8-2

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

DRY MILK BLENDING OPERATION CONSISTING OF TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY A 4,250 CFM DONALDSON MODEL 2DF12 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the dust collector 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. The dust collector shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filters. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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
5. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement filters numbering at least 10% of the total number of filters in the dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The differential pressure gauge reading range shall be established per manufacturer's recommendation at the next District inspection. [District Rule 2201]
8. The quantity of dry milk processed shall not exceed 72.0 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.00022 pounds per ton of the dry milk processed. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain daily records of the quantity of dry milk processed, in tons, and shall keep the records on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
13. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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.

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-2149-0-2

EXPIRATION DATE: 11/30/2016

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; Stanislaus 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; Stanislaus 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: 475 S TEGNER RD, TURLOCK, CA 95380
N-2149-0-2 : Sep 9 2016 10:30AM -- 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] Federally Enforceable Through Title V Permit
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: N-2149-1-3

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7500 SCFM

PERMIT UNIT REQUIREMENTS

1. 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
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of product bagged shall not exceed 400,000 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
9. A daily log shall be maintained and shall include the total weight of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and Stanislaus County Rule 107] Federally Enforceable Through Title V Permit
11. 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
12. 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: N-2149-2-7

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER

PERMIT UNIT REQUIREMENTS

1. The dryer shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
2. The dryer shall be equipped with a totalizing fuel flow meter which measures the quantity of natural gas consumed per day (in cubic feet). [District Rule 2201] Federally Enforceable Through Title V Permit
3. The wet scrubber sprays and/or nozzles shall be maintained in optimum working order. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All ducting from the drying operations to the wet scrubber shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heat input to the dryer shall not exceed 207 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The heat input to the dryer shall not exceed 70,445 MMBtu/year, calculated on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of powdered milk produced shall not exceed 106.6 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The NO_x emissions due to the combustion of natural gas shall not exceed 3.5 ppmv @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CO emissions due to the combustion of natural gas shall not exceed 11.37 ppmv @ 19% O₂ (equivalent to 0.084 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The SO_x emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The PM₁₀ emissions from the drying operation shall not exceed 0.348 lb/ton of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The combined PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

16. Source testing to measure PM₁₀ emissions from the scrubber exhaust gas shall be conducted at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to measure NO_x and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure PM₁₀ emissions from the scrubber exhaust gas shall be conducted using EPA Method 5, or CARB 501/501A or any other District and EPA approved test method. [District Rule 2201] Federally Enforceable Through Title V Permit
20. 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
21. NO_x 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
22. 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
23. 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
24. 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
25. 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
26. All test results for NO_x 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
27. The permittee shall monitor and record the stack concentration of NO_x, 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
28. If either the NO_x 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

29. 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
30. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records which demonstrate the dryer is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
32. The permittee shall maintain a daily record, in MMBtu, of the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records on a 12-month rolling basis, in MMBtu, the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The permittee shall maintain a daily record, in pounds, of the quantity of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309] 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: N-2149-3-7

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM.

PERMIT UNIT REQUIREMENTS

1. 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
2. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
4. The total PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the cumulative daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, 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. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. If either the NO_x 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 show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. 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.

9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
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 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure natural gas-combustion NO_x 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, 4306 and 4320] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. 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
15. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 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. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. 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: N-2149-4-7

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER.

PERMIT UNIT REQUIREMENTS

1. 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
2. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
4. The total PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the cumulative daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, 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. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. If either the NO_x 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 show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. 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.

9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
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 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure natural gas-combustion NO_x 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, 4306 and 4320] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. 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
15. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 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. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. 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: N-2149-5-4

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS

PERMIT UNIT REQUIREMENTS

1. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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
5. Each baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from each baghouse serving the drying 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
7. All ducting from the drying operations to the baghouses shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The dryer shall only be fired on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The quantity of powdered milk produced shall not exceed 228 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The NO_x emissions due to the combustion of natural gas shall not exceed 4.81 ppmv @ 19% O₂ (equivalent to 0.055 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The CO emissions due to the combustion of natural gas shall not exceed 8.26 ppmv @ 19% O₂ (equivalent to 0.061 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The SO_x emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The PM₁₀ emissions from the dryer baghouses shall not exceed 0.141 lb/ton of powdered milk processed. [District Rule 2201] 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.

15. The combined PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. 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
18. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
20. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
23. 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
24. 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
25. 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
26. 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
27. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
31. Records of the daily quantity of powdered milk produced shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
33. 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
34. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309] Federally Enforceable Through Title V Permit
35. 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
36. 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
37. 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
38. 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
39. 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
40. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR 64] Federally Enforceable Through Title V Permit
41. 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. [District Rule 2520 and 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: N-2149-6-2

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. 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
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of product bagged shall not exceed 444.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emission concentration shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Records of the daily quantity of powder milk bagged shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Records of the cumulative daily quantity of PM10 emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The total PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
13. 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
14. 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: N-2149-7-2

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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] Federally Enforceable Through Title V Permit
2. 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
3. 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
4. Emissions shall not exceed any of the following: 6.9 g-NO_x/bhp-hr; 1.4 g-CO/bhp-hr; or 1.0 g-VOC/bhp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed 0.4 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 21 hours per calendar year. [District Rules 2201 and 4702, and 40 CFR 63.6640 (f)(ii)] Federally Enforceable Through Title V Permit
9. 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
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. 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.), records of operational characteristics monitoring, and the sulfur content of the diesel fuel used. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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
18. 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: N-2149-8-1

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

DRY MILK BLENDING OPERATION CONSISTS TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY DONALDSON MODEL 2DF12 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the dust collector 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. The 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] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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
5. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of dry milk processed shall not exceed 72 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.00022 pounds per ton of the dry milk processed. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Daily records of the quantity of dry milk processed, in tons, shall be kept on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070] Federally Enforceable Through Title V Permit
11. 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
12. 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.

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=2149 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

CALIFORNIA DAIRIES, INC. 475 S TEGNER RD TURLOCK, CA 95380	FAC # N 2149	TYPE: TITLE	EXPIRE ON: AREA:	11/30/2016 6/
STATUS: TELEPHONE:	A	TOXIC ID:	INSP. DATE:	03/16

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2149-1-3	64.5 HP	3020-01 C	1	207.00	207.00	A	POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7500 SCFM
N-2149-2-7	11.2 MMBtu/hr dryer	3020-02 G	1	855.00	855.00	A	11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER
N-2149-3-7	60.6 MMBtu/hr	3020-02 H	1	1,080.00	1,080.00	A	60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM.
N-2149-4-7	60.7 MMBtu/hr	3020-02 H	1	1,080.00	1,080.00	A	60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER.
N-2149-5-4	31.5 MMBtu/hr dryer	3020-02 H	1	1,080.00	1,080.00	A	31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS
N-2149-6-2	72 HP	3020-01 C	1	207.00	207.00	A	POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE
N-2149-7-2	2,220 bhp	3020-10 F	1	785.00	785.00	A	2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR
N-2149-8-1	105 hp electric motors	3020-01 D	1	330.00	330.00	A	DRY MILK BLENDING OPERATION CONSISTS TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY DONALDSON MODEL ZDF12 DUST COLLECTOR

Number of Facilities Reported: 1

ATTACHMENT D

EPA Comments and District Responses

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 November 30, 2016, which means that a timely application was due between May 31, 2015 and May 31, 2016. The submittal of a complete application on February 27, 2015 does not meet 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). However, the District plans to issue a valid renewed Title V operating permit prior to the expiration of the current Title V operating permit.

EPA Comment 2:

Currently the permit does not specify how compliance with the stated emission limits [SO_x, PM₁₀, and VOC] 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_x 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 2:

District Rule 2520, Section 9.3.2 requires periodic monitoring to ensure compliance with emission limits when applicable requirements do not require periodic testing or instrumental or non-instrumental monitoring. Section 9.3.2 also provides that recordkeeping requirements maybe sufficient to meet the requirements of this section.

The SO_x, PM₁₀, and VOC emission limits were included on permits N-2149-3 and -4 to ensure compliance with the requirements of District Rule 2201. The following addresses compliance with Section 9.3.2 of Rule 2520 for SO_x, PM₁₀, and VOC.

SO_x and PM₁₀

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

Additionally, PM₁₀ 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 PM₁₀ emission factor for gaseous fuel-fired boilers is ensured by the use of PUC-quality natural gas.

Therefore, the use of natural gas from a PUC-regulated source ensures compliance with both the SO_x and PM₁₀ emission limits. The owner/operator will be required to maintain records supporting that the natural gas is provided from a PUC-regulated source.

VOC

The rate of VOC emissions from boilers depends on combustion efficiency. VOC emissions are minimized by combustion practices that promote high combustion temperatures, long residence times at those temperatures, and turbulent mixing of fuel and combustion air. VOC species in the natural gas fuel (e.g., formaldehyde and benzene) may also contribute to VOC emissions if they are not completely combusted in the boiler. Proper maintenance and operation of the boilers will ensure proper combustion of fuel and will ensure that the entire burner and boiler operate as efficiently as possible. The owner/operator will be

required to maintain the boilers in good operating condition and operate the boilers in a manner to minimize emissions of air contaminants into the atmosphere. The owner/operator will also be required to maintain records of all equipment maintenance.

The renewal evaluation has been revised (page 8) to include a compliance discussion for Rule 2520, section 9.3.2 and conditions (#s 1, 11, and 12 on each permit N-2149-3 and '-4) 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_x, PM₁₀, 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.