

MAY 01 2018

Mr. Daniel Lee  
Wonderful Pistachios & Almonds  
13646 Highway 33  
Lost Hills, CA 93249

**Re: Notice of Preliminary Decision – ATC / Certificate of Conformity  
District Facility # S-377  
Project # S-1173646**

Dear Mr. Lee:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project consists of the removal of one blanching line and the addition of one flavoring line with one 4.4 MMBtu/hr dryer.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authority to Construct with a Certificate of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjolle  
Director of Permit Services

Enclosures

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

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

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

Facility Name:	Wonderful Pistachios & Almonds	Date:	April 23, 2018
Mailing Address:	13646 Highway 33 Lost Hills, CA 93249	Engineer:	Jonah Aiyabei
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Application #:	S-377-40-17		
Project #:	S-1173646		
Deemed Complete:	November 6, 2017		

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**I. Proposal**

Wonderful Pistachios & Almonds (WPA) was issued Authority to Construct (ATC) permit #S-377-40-14 in 2014 for the removal of one blanching line and the installation of two flavoring lines each with a 4.4 MMBtu/hr dryer. ATC permit #S-377-40-15 was issued in 2015 for various corrections and clarifications to the equipment description. Copies of these ATC permits are included in Appendix C. The facility was still known as "Paramount Farms" at the time these ATCs were issued, but the name was changed to "Wonderful Pistachios & Almonds" shortly thereafter.

WPA has completed removal of the blanching line and installation of one flavoring line with a 4.4 MMBtu/hr dryer, but has determined that the previously proposed second flavoring line with a 4.4 MMBtu/hr dryer is no longer required and will not be installed. WPA has therefore requested that the previously issued ATC permit #S-377-40-14 be corrected to reflect the "as built" equipment.

Pursuant to District practice, under certain circumstances, an ATC permit authorizing multiple installations or modifications that can be carried out in discrete phases and started up or operated independently (i.e. installations or modifications for which separate ATC permits could have been issued), may be partially implemented, with issuance of operating permit(s) only for the installation(s)/modification(s) actually carried out. As discussed above, ATC permit #S-377-40-14 authorized the installation of two flavoring lines. Since one of the lines has been installed and placed in operation while the second one has not been installed, it is clear that these lines are discrete and independent of each other. The applicant has also provided the offsets that were required for implementation of the ATC. The ATC permit is therefore considered to have been partially implemented. However, since the ATC permit required offsets and public notice, a corrected ATC permit showing only the modifications made and the recalculated offsets will be issued. A public notice as was required by the original ATC will also be issued.

The new ATC permit will also include any previously approved equipment description corrections and clarifications, thus effectively replacing ATC permit #S-377-40-15. The following corrections and clarifications were authorized in ATC permit #S-377-40-15:

- Include three 2.5 MMBtu/hr dryers that were authorized in 2013 through ATC S-377-40-11 (project #S-1130510). The three dryers were installed but were subsequently dropped from the equipment description by error.
- Remove reference to the following components: two 1.2 MMBtu/hr dryers, salt removal shaker associated with the Proctor Schwartz dryer, and filter socks that served equipment that has been removed per FDA requirements.
- Clarify post-project equipment description as shown on the ATC (see Appendix C).

The following permit condition will be placed on the new ATC permit to indicate that the previously issued ATC permits will be replaced:

- This Authority to Construct (ATC) replaces ATCs S-377-40-14 and S-377-40-15. [District Rule 2201]

WPA received their Title V Permit on August 31, 2001. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. WPA must apply to administratively amend their Title V permit.

## II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4309	Dryers, Dehydrators, and Ovens (12/15/05)
Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177:	California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387:	CEQA Guidelines

## III. Project Location

The facility is located at 13646 Highway 33, Lost Hills, approximately four miles north of Blackwells Corner, California. The equipment is not located within 1,000 feet of the outer

boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

#### **IV. Process Description**

The pre-processing operation (S-377-10) may receive almonds from various hulling and shelling operations and passes them through a series of sizing and grading equipment. This equipment sorts the almonds by size and color into storage bins for further processing.

The sorted and cleaned almonds from pre-processing will be conveyed directly to a tank farm in building A1. From there the almonds are conveyed to either the pasteurization process or to flavoring and drying.

The almond processing and packaging operation (S-377-40) completes the sorting process and routes the nuts through various process units (blanchers, slicer/dicers, etc.) for preparation and packaging as required by the end user.

After flavoring and/or pasteurization the almonds are routed to a second tank farm and then to one of four packaging lines.

Whole or sliced nuts that have passed through a flavor coating operation (which is a wet process) are fed into the dryer by a conveyor. The nuts are then conveyed through the heat zones of the dryer, the cooling zones, and then back into storage bins for packaging. The dryer operating parameters such as conveyor speeds, heat zone temperatures, and air flow rates are all adjusted as needed to obtain the specified product consistency.

The blanching operations are served by cyclones. The almonds are immersed in hot water (~195 deg. F) in the scalding tank. The hot water breaks down the glue which binds the skin to the meat, thus loosening the skin. The loose wet skins are then vacuumed away and removed from the air stream by cyclones. This wet process is not expected to produce any PM<sub>10</sub> emissions and the cyclones are not considered to be air pollution control devices. The cyclones allow for the easy packaging of almond skins, which are sold as cattle feed.

#### **V. Equipment Listing**

##### Pre-Project Equipment Description:

S-377-40-16: 18.62 MMBTU/HR NATURAL GAS-FIRED ALMOND FINISHING, FLAVORING, AND PACKAGING OPERATION WITH ONE 0.32 MMBTU/HR PLASTICIZER (WITH 32 BURNERS), THREE INCUS 2.5 MMBTU/HR DIRECT-FIRED DRYERS, ONE 3.6 MMBTU/HR PROCTOR SCHWARTZ DRYER #2 (WITH TWO BURNERS), ONE 3.6 MMBTU/HR AEROGLIDE NUT DRYER #2 (WITH TWO BURNERS) VENTED TO A CYCLONE, ONE 4.0 MMBTU/HR AEROGLIDE NUT DRYER #3 VENTED TO TWO CYCLONE ASSEMBLIES, AND ASSOCIATED PERMIT-EXEMPT EQUIPMENT

Proposed Modification:

Remove one blanching line and add one flavoring line with one 4.4 MMBtu/hr dryer

S-377-40-17: MODIFICATION OF 18.62 MMBTU/HR NATURAL GAS-FIRED ALMOND FINISHING, FLAVORING, AND PACKAGING OPERATION WITH ONE 0.32 MMBTU/HR PLASTICIZER (WITH 32 BURNERS), THREE INCUS 2.5 MMBTU/HR DIRECT-FIRED DRYERS, ONE 3.6 MMBTU/HR PROCTOR SCHWARTZ DRYER #2 (WITH TWO BURNERS), ONE 3.6 MMBTU/HR AEROGLIDE NUT DRYER #2 (WITH TWO BURNERS) VENTED TO A CYCLONE, ONE 4.0 MMBTU/HR AEROGLIDE NUT DRYER #3 VENTED TO TWO CYCLONE ASSEMBLIES, AND ASSOCIATED PERMIT-EXEMPT EQUIPMENT: REMOVE ONE BLANCHING LINE AND ADD ONE FLAVORING LINE WITH ONE 4.4 MMBTU/HR DRYER

Post-Project Equipment Description:

S-377-40-17: 23.02 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING, FLAVORING, AND PACKAGING OPERATION WITH ONE 0.32 MMBTU/HR PLASTICIZER (WITH 32 BURNERS), THREE INCUS 2.5 MMBTU/HR DIRECT-FIRED DRYERS, ONE 3.2 MMBTU/HR PROCTOR SCHWARTZ DRYER #2 (WITH TWO BURNERS), ONE 3.6 MMBTU/HR AEROGLIDE NUT DRYER #2 (WITH TWO BURNERS) VENTED TO A CYCLONE, ONE 4.0 MMBTU/HR AEROGLIDE NUT DRYER #3 VENTED TO A CYCLONE, ONE 4.4 MMBTU/HR CPM WOLVERINE/PROCTOR DRYER VENTED TO A FABRIC DUST COLLECTOR, AND ASSOCIATED PERMIT EXEMPT EQUIPMENT

## **VI. Emission Control Technology Evaluation**

The only portion of almond finishing/flavoring operation equipment that is assessed emissions is the combustion equipment. This type of unit is fired on commercial natural gas. The small burners used in these units are thermostatically controlled to maintain drying chamber temperature usually in the 170 deg. F to 230 deg. F range with large amounts of excess air. This relatively cool chamber temperature is achieved with a cool burner temperature, which inherently produces less NOx than other types of dryers.

The proposed equipment is expected to produce abraded pieces of nuts and nut skins greater than 10 microns in size (i.e. > PM<sub>10</sub>). The air flow from the dryers is routed to fabric collectors to collect this material (byproduct) for sale and also for vector (insects and rodents) control purposes. The fabric collectors are therefore not considered as air pollution control devices.

## **VII. General Calculations**

As discussed in Section I of this evaluation, ATC S-377-40-14, which originally authorized the modifications being addressed in the current project, has been partially implemented. The associated engineering evaluation (project S-1142949) and permit conditions will therefore remain valid, except for the corrections being addressed in the current project. Since the proposed correction (i.e. add only one 4.4 MMBtu/hr dryer instead of the originally proposed two)

results in a lower potential to emit, there will be no adverse changes to any of the NSR determinations previously made in project S-1142949. Also, as discussed in Section VIII, the current project is not an NSR modification. Detailed NSR calculations and determinations are therefore not necessary. Only the calculations needed to show the corrections being made will be conducted.

The corrected PE calculations for the affected permit unit are shown in the following section. Corrected Quarterly Net Emissions Change (QNEC) calculations are included in Appendix D.

**A. Assumptions**

- The facility operates full time.
- Units will only be fired on PUC regulated natural gas.
- PM<sub>10</sub> emissions from pre-cleaned nuts are negligible.
- Heating value of natural gas is 1,000 MMBtu/MMscf.
- The fuel usage rates for the different emissions units are as summarized in the following tables:

<b>Fuel Usage Summary – Pre-Existing Emission Units</b>		
<b>Equipment</b>	<b>Daily Usage (MMscf/day)</b>	<b>Annual Usage (MMscf/yr)</b>
Plasticizer burners (32 @ 10,000 btu/hr)	0.1035	10.0
Three Incus dryers @ 2.5 MMBtu/hr	0.18	56.31
Proctor Schwartz roaster (2 x 1.6 MMBtu/hr); Aeroglide (#2) roaster (2 x 1.8 MMBtu/hr)	0.1632	37.15
One 4.0 MMBtu/hr Aeroglide (#3) nut dryer	0.096	30.0

<b>Fuel Usage Summary – new Emission Unit</b>		
<b>Equipment</b>	<b>Daily Usage (MMscf/day)</b>	<b>Annual Usage (MMscf/yr)</b>
One CPM Wolverine/Proctor dryer @ 4.4 MMBtu/hr	0.11	38.54

**B. Emission Factors**

The emission factors for the pre-existing emission units, based on the current permit requirements, are summarized in the following table:

<b>Emission Factors – Existing Emission Units</b>					
<b>Emissions unit</b>	<b>NOx (lb/MMscf)</b>	<b>SOx (lb/MMscf)</b>	<b>PM10 (lb/MMscf)</b>	<b>CO (lb/MMscf)</b>	<b>VOC (lb/MMscf)</b>
Plasticizer burners	44.0	2.85	5.0	8.6	5.8
Incus dryer burners	10.9	2.85	2.8	147.8	3.8
Proctor Schwartz, Aeroglidge (#2), & CPM Wolverine/Proctor burner	36.0	2.85	7.6	21.0	5.5
Aeroglidge (#3) burner	83.2	2.85	2.8	21.0	3.8

The emission factors for the new emission unit, based on the applicant's proposal, are summarized in the following table:

<b>Emission Factors – New Emission Unit</b>					
<b>Emissions unit</b>	<b>NOx (lb/MMscf)</b>	<b>SOx (lb/MMscf)</b>	<b>PM10 (lb/MMscf)</b>	<b>CO (lb/MMscf)</b>	<b>VOC (lb/MMscf)</b>
CPM Wolverine/Proctor burner	36.0	2.85	7.6	21.0	5.5

**C. Corrected Calculations**

The daily potential to emit (PE) is calculated as follows:

$$\text{Daily PE} = \text{EF (lb/MMscf)} \times \text{fuel usage (MMscf/day)}$$

The daily PEs are summarized in the following tables:

<b>Daily PE1 Summary</b>					
<b>Emissions unit</b>	<b>NOx (lb/day)</b>	<b>SOx (lb/day)</b>	<b>PM10 (lb/day)</b>	<b>CO (lb/day)</b>	<b>VOC (lb/day)</b>
Plasticizer burners	4.6	0.3	0.5	0.9	0.6
Three Incus dryers	2.0	0.5	0.5	26.6	0.7
Proctor Schwartz roaster & Aeroglidge #2 roaster	5.9	0.5	1.2	3.4	0.9
Aeroglidge #3 nut dryer	8.0	0.3	0.3	2.0	0.4
<b>Total</b>	<b>20.5</b>	<b>1.6</b>	<b>2.5</b>	<b>32.9</b>	<b>2.6</b>

<b>Daily PE2 Summary</b>					
<b>Emissions unit</b>	<b>NOx (lb/day)</b>	<b>SOx (lb/day)</b>	<b>PM10 (lb/day)</b>	<b>CO (lb/day)</b>	<b>VOC (lb/day)</b>
Plasticizer burners	4.6	0.3	0.5	0.9	0.6
Three Incus dryers	2.0	0.5	0.5	26.6	0.7
Proctor Schwartz roaster & Aeroglide #2 roaster	5.9	0.5	1.2	3.4	0.9
Aeroglide #3 nut dryer	8.0	0.3	0.3	2.0	0.4
One CPM Wolverine/Proctor dryer	4.0	0.3	0.8	2.3	0.6
<b>Total</b>	<b>24.5</b>	<b>1.9</b>	<b>3.3</b>	<b>35.2</b>	<b>3.2</b>

The annual PE is calculated as follows:

$$\text{Annual PE} = \text{EF (lb/MMscf)} \times \text{fuel usage (MMscf/yr)}$$

The annual PEs are summarized in the following tables:

<b>Annual PE1 Summary</b>					
<b>Emissions unit</b>	<b>NOx (lb/yr)</b>	<b>SOx (lb/yr)</b>	<b>PM10 (lb/yr)</b>	<b>CO (lb/yr)</b>	<b>VOC (lb/yr)</b>
Plasticizer burners	440	29	50	86	58
Three Incus dryers	614	160	158	8,323	214
Proctor Schwartz roaster & Aeroglide #2 roaster	1,337	106	282	780	204
Aeroglide #3 nut dryer	2,496	86	84	630	114
<b>Total</b>	<b>4,887</b>	<b>381</b>	<b>574</b>	<b>9,819</b>	<b>590</b>

<b>Annual PE2 Summary</b>					
<b>Emissions unit</b>	<b>NOx (lb/yr)</b>	<b>SOx (lb/yr)</b>	<b>PM10 (lb/yr)</b>	<b>CO (lb/yr)</b>	<b>VOC (lb/yr)</b>
Plasticizer burners	440	29	50	86	58
Three Incus dryers	614	160	158	8,323	214
Proctor Schwartz roaster & Aeroglide #2 roaster	1,337	106	282	780	204
Aeroglide #3 nut dryer	2,496	86	84	630	114
One CPM Wolverine/Proctor dryer	1,387	110	293	809	212
<b>Total</b>	<b>6,274</b>	<b>491</b>	<b>867</b>	<b>10,628</b>	<b>802</b>



## VIII. Compliance Determination

### Rule 2201 New and Modified Stationary Source Review Rule

Section 3.25 states that a modification is an action including at least one of the following items:

§3.25.1.1: 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.

The current application does not include a change in hours of operation, production rate, or method of operation, which would necessitate a change in permit conditions.

§3.25.1.2: Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.

The current application does not involve any physical changes to the emissions unit.

§3.25.1.3: 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.

Since there is no change in the existing equipment, throughput, or method of operation, and there will be no change in emissions.

§3.25.1.4: Addition of any new emissions unit which is subject to District permitting requirements.

The current application does not include the addition of any new emissions units.

§3.25.1.5: 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.

The applicant is not seeking to obtain any exemptions from applicable requirements.

As shown above, the current project is not a modification as defined by Rule 2201. District Rule 2201 applies to new stationary sources and modifications of stationary sources. Since this is not a new stationary source and not a modification, District Rule 2201 does not apply. However, since the current project is a correction of a previously approved project (#S-1144929), the following NSR sections that were addressed in the original project will be addressed in the current project to reflect the corrections being made:

#### A. Offsets

As previously determined in project #S-1144929, the original modification triggered offsets for NOx. Since the current project involves a correction of the previously determined PE, offset calculations will also be corrected.

The quantity of offsets is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated:

Offsets Required (lb/year) =  $(\Sigma[PE2 - BE] + ICCE) \times DOR$ , for all new or modified emissions units in the project,

Where:

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

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

The original project involved the installation of a new emissions unit (i.e. BE = 0), and there are no cargo carrier emissions associated with this facility, hence offsets can be determined as follows:

Offsets Required (lb/year) =  $([PE2 - BE] + ICCE) \times DOR$

PE2 (NO<sub>x</sub>) = 1,387 lb/year

BE (NO<sub>x</sub>) = 0 lb/year

ICCE = 0 lb/year

DOR = 1.5 (The original project was a federal major modification)

Offsets Required (lb/year) =  $([1,387 - 0] + 0) \times 1.5$   
 $= 1,387 \times 1.5$   
 $= 2,081 \text{ lb NO}_x/\text{year}$

Quarterly offsets required (lb/quarter) =  $(2,081 \text{ lb NO}_x/\text{year}) \div (4 \text{ quarters/year})$   
 $= 520.25 \text{ lb/quarter}$

As shown in the calculation above, the quarterly amount of offsets required for this project, when evenly distributed to each quarter, results in fractional pounds of offsets being required each quarter. Since offsets are required to be withdrawn as whole pounds, the quarterly amounts of offsets need to be adjusted to ensure the quarterly values add up to the total annual amount of offsets required.

To adjust the quarterly amount of offsets required, the fractional amount of offsets required in each quarter will be summed up and redistributed to each quarter based on the number of days in each quarter. The redistribution scheme is based on Quarter 1 having the fewest days and Quarters 3 and 4 having the most days. The redistribution scheme is summarized in the following table:

Redistribution of Required Quarterly Offsets (where X is the annual amount of offsets, and $X \div 4 = Y.z$ )				
Value of z	Quarter 1	Quarter 2	Quarter 3	Quarter 4
.0	Y	Y	Y	Y
.25	Y	Y	Y	Y+1
.5	Y	Y	Y+1	Y+1
.75	Y	Y+1	Y+1	Y+1

Therefore the appropriate quarterly emissions to be offset are as follows:

<u>1<sup>st</sup> Quarter</u>	<u>2<sup>nd</sup> Quarter</u>	<u>3<sup>rd</sup> Quarter</u>	<u>4<sup>th</sup> Quarter</u>	<u>Annual Total</u>
520 lb	520 lb	520 lb	521 lb	2,081 lb

The applicant proposed ERC certificate C-497-2 to offset the increases in NO<sub>x</sub> emissions associated with the original modification project. At the time of the original offset proposal, this certificate had available quarterly NO<sub>x</sub> credits as follows:

	<u>1<sup>st</sup> Quarter</u>	<u>2<sup>nd</sup> Quarter</u>	<u>3<sup>rd</sup> Quarter</u>	<u>4<sup>th</sup> Quarter</u>
ERC #C-497-2	1,000 lb	2,000 lb	4,000 lb	3,000 lb

The proposed certificate was therefore sufficient to fully offset the quarterly NO<sub>x</sub> emissions increases associated with the project.

**Revised Offset Conditions:**

- Prior to operating equipment under this Authority to Construct, permittee shall surrender NO<sub>x</sub> emission reduction credits for the following quantity of emissions: 1st quarter - 520 lb, 2nd quarter - 520 lb, 3rd quarter - 520 lb, and 4th quarter - 521 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
- ERC Certificate Number C-497-2 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct [District Rule 2201]

On December 24, 2014, via ERC withdrawal project #C-1142848 (certificate #C-1326-2, split from C-497-2), the applicant withdrew the quantity of ERCs specified on the previous ATC (S-377-40-14), which was 1,035 lb-NO<sub>x</sub> for each quarter. Since the quantity of ERCs already provided is greater than the quantity required for the revised project scope, the offset requirements have been fully met.

**B. Public Notification**

Since the original project required public notice (for federal major modification purposes) and the current corrections result in a change to the previously proposed offset requirements, the public notice will be reissued.

### C. Daily Emission Limits (DELs) and Rule 2201 Conditions

In addition to the offset conditions, the following conditions reflecting all other corrections made will be placed on the re-issued ATC:

- This Authority to Construct (ATC) replaces ATCs S-377-40-14 and S-377-40-15. [District Rule 2201]
- All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rules 2201 and 4801]
- Combustion equipment shall be equipped with operational non-resettable, totalizing fuel meters to demonstrate compliance with fuel consumption limits. [District Rule 2201]
- Emissions from the slicer/sliver line plasticizer burners shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 5.0 lb-PM10/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District Rule 2201]
- The slicer/sliver line plasticizer burners' natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District Rule 2201]
- Emissions from the Proctor Schwartz, Aeroglide (#2), and CPM Wolverine/Proctor burners shall not exceed any of the following limits: 36.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 7.6 lb-PM10/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201]
- The Proctor Schwartz and Aeroglide (#2) roasters' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District Rule 2201]
- CPM Wolverine/Proctor dryer's total natural gas usage shall not exceed 0.11 MMscf/day. [District Rule 2201]
- Emission rate per MMscf gas burned from the 4.0 MMBtu/hr Aeroglide (#3) nut dryer shall not exceed any of the following: PM10: 2.8 lb/MMscf, SOx as (SO2): 2.85 lb/MMscf, NOx (as NO2): 83.2 lb/MMscf, VOC: 3.8 lb/MMscf, or CO: 21.0 lb/MMscf. [District Rule 2201]
- Natural gas combusted in the 4.0 MMBtu/hr Aeroglide (#3) nut dryer shall not exceed 0.096 MMscf/day nor 30 MMscf/yr. [District Rule 2201]
- Emissions from the Incus dryer burners shall not exceed any of the following limits: 10.9 lb-NOX/MMscf (as NO2), 2.85 lb-SOX/MMscf (as SO2), 2.8 lb-PM10/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201]
- The three 2.5 MMBtu/hr Incus dryers' combined natural gas usage shall not exceed 180,000 scf/day and 56.31 MMscf/year. [District Rule 2201]

- Records of daily and annual natural gas consumption shall be maintained to demonstrate compliance with each specific permit limit. [District Rules 1070, 2201, and 2520]
- All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 2520]

#### **Rule 2410 Prevention of Significant Deterioration**

This project does not result in a new PSD major source or PSD major modification. No further discussion is required.

#### **Rule 2520 Federally Mandated Operating Permits**

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, Minor Permit Modifications are permit modifications that:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements;
7. Do not grant or modify a permit shield.

Additionally, Section 11.4 requires a description of the proposed change, the emissions resulting from the change, any new applicable requirements that will apply if the change occurs, suggested draft permits, compliance certification and an EPA 45-day review period of the proposed permit modification (or a shorter period if EPA has notified the District that EPA will not object to issuance of the permit modification, whichever is first).

As discussed above, the facility has applied for a Certificate of Conformity (COC) and the District will forward to EPA, for a 45-day review period, this application review which includes the proposed modified Title V permit [i.e. proposed ATC(s)] and the compliance certification form which demonstrates compliance with the minor permit modification requirements in Section 11.4. Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

#### **Rule 4001 New Source Performance Standards (NSPS)**

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to nut processing operations.

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

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to nut processing operations.

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

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). All particulate removal equipment handles particles greater than 10 microns and all combustion equipment burns PUC quality natural gas; therefore visible emissions are not expected to exceed Ringelmann 1 or 20% opacity.

The following condition will be placed on the permit to ensure continued compliance:

- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

#### **Rule 4102 Nuisance**

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained.

The following condition will be placed on the permit to ensure continued compliance:

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

### **California Health & Safety Code 41700 (Health Risk Assessment)**

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

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

### **Rule 4201 Particulate Matter Concentration**

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot. As this equipment is all fired on PUC quality natural gas compliance with this rule is expected.

The following condition will be placed on the permit to ensure continued compliance:

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

### **Rule 4301 Fuel Burning Equipment**

This rule specifies maximum emission rates in lb/hr for SO<sub>2</sub>, NO<sub>2</sub>, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf.

This rule is applicable to fuel burning equipment that is defined in §3.1 of the rule as:

- Fuel Burning Equipment: any furnace, boiler, apparatus, stack, and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer.

The proposed dryers heat the nuts by direct heat transfer (the products of combustion come into contact with the process material); therefore, this rule is not applicable to this equipment.

### **Rule 4309 Dryer, Dehydrators, and Ovens**

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from dryers, dehydrators, and ovens. This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 MMBtu/hr or greater. Since the dryers being installed have a heat input rating less than 5.0 MMBtu they are not subject to the requirements of this rule. No further discussion is required.

### **Rule 4801 Sulfur Compounds**

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes.

The combustion equipment listed on this permit emits sulfur compounds and is limited to fire exclusively on PUC regulated natural gas that will ensure compliance with this rule.

Therefore, the following condition will be listed on the ATC to ensure compliance:

- All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rules 2201 and 4801]

### **California Health & Safety Code 42301.6 (School Notice)**

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

### **California Environmental Quality Act (CEQA)**

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

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

### **Greenhouse Gas (GHG) Significance Determination**

District is a Lead Agency & GHG emissions increases are from the combustion of fossil fuel other than jet fuels

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

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



an approved GHG emission reduction plan or GHG mitigation program, which avoids or substantially reduces GHG emissions within the geographic area in which the project is located, would be determined to have a less than significant individual and cumulative impact for GHG emission.

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

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

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

### **District CEQA Findings**

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the potential project emissions are equal to or less than 2 lbs per day per pollutant, and therefore considerably below all annual criteria emissions CEQA significant thresholds. The activity will occur at an existing facility and involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. Therefore, the District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

### **Indemnification Agreement/Letter of Credit Determination**

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement

and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The criteria pollutant emissions and toxic air contaminant emissions associated with the proposed project are not significant, and there is minimal potential for public concern for this particular type of facility/operation. Therefore, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

#### **IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Issue ATC permit #S-377-40-17 subject to the permit conditions on the draft in Appendix A.

#### **X. Billing Information**

<b>Annual Permit Fees</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Annual Fee</b>
S-377-40-17	3020-02-H	23.02 MMBtu/hr	\$1,128

#### **Appendices**

- A: Draft ATC Permit
- B: Current PTO
- C: Previously Issued ATC Permits (S-377-40-14 and 40-15)
- D: QNEC
- E: Compliance Certification

## **APPENDIX A**

### **Draft ATC Permit**

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: S-377-40-17

LEGAL OWNER OR OPERATOR: WONDERFUL PISTACHIOS & ALMONDS  
MAILING ADDRESS: 13646 HIGHWAY 33  
LOST HILLS, CA 93249

LOCATION: 3.5 MILES NORTH OF HWY 46 ON HWY 33  
LOST HILLS, CA

SECTION: NE23 TOWNSHIP: 26S RANGE: 19E

### EQUIPMENT DESCRIPTION:

MODIFICATION OF 18.62 MMBTU/HR NATURAL GAS-FIRED ALMOND FINISHING, FLAVORING, AND PACKAGING OPERATION WITH ONE 0.32 MMBTU/HR PLASTICIZER (WITH 32 BURNERS), THREE INCUS 2.5 MMBTU/HR DIRECT-FIRED DRYERS, ONE 3.6 MMBTU/HR PROCTOR SCHWARTZ DRYER #2 (WITH TWO BURNERS), ONE 3.6 MMBTU/HR AEROGlide NUT DRYER #2 (WITH TWO BURNERS) VENTED TO A CYCLONE, ONE 4.0 MMBTU/HR AEROGlide NUT DRYER #3 VENTED TO TWO CYCLONE ASSEMBLIES, AND ASSOCIATED PERMIT-EXEMPT EQUIPMENT: REMOVE ONE BLANCHING LINE AND ADD ONE FLAVORING LINE WITH ONE 4.4 MMBTU/HR DRYER

## CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) replaces ATCs S-377-40-14 and S-377-40-15. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOx emission reduction credits for the following quantity of emissions: 1st quarter - 520 lb, 2nd quarter - 520 lb, 3rd quarter - 520 lb, and 4th quarter - 521 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

**Arnaud Marjolle, Director of Permit Services**  
S-377-40-17 Apr 24 2010 7:48AM - AYABEJ Jcm1 Inspection NOT Required

5. ERC Certificate Number C-497-2 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct [District Rule 2201] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
8. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
10. Combustion equipment shall be equipped with operational non-resettable, totalizing fuel meters to demonstrate compliance with fuel consumption limits. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the slicer/sliver line plasticizer burners shall not exceed any of the following limits: 44.0 lb-NO<sub>x</sub>/MMscf, 2.85 lb-SO<sub>x</sub>/MMscf, 5.0 lb-PM<sub>10</sub>/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The slicer/sliver line plasticizer burners' natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from the Proctor Schwartz, Aeroglide (#2), and CPM Wolverine/Proctor burners shall not exceed any of the following limits: 36.0 lb-NO<sub>x</sub>/MMscf, 2.85 lb-SO<sub>x</sub>/MMscf, 7.6 lb-PM<sub>10</sub>/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The Proctor Schwartz and Aeroglide (#2) roasters' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. CPM Wolverine/Proctor dryer's total natural gas usage shall not exceed 0.11 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emission rate per MMscf gas burned from the 4.0 MMBtu/hr Aeroglide (#3) nut dryer shall not exceed any of the following: PM<sub>10</sub>: 2.8 lb/MMscf, SO<sub>x</sub> as (SO<sub>2</sub>): 2.85 lb/MMscf, NO<sub>x</sub> (as NO<sub>2</sub>): 83.2 lb/MMscf, VOC: 3.8 lb/MMscf, or CO: 21.0 lb/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Natural gas combusted in the 4.0 MMBtu/hr Aeroglide (#3) nut dryer shall not exceed 0.096 MMscf/day nor 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions from the Incus dryer burners shall not exceed any of the following limits: 10.9 lb-NO<sub>x</sub>/MMscf (as NO<sub>2</sub>), 2.85 lb-SO<sub>x</sub>/MMscf (as SO<sub>2</sub>), 2.8 lb-PM<sub>10</sub>/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The three 2.5 MMBtu/hr Incus dryers' combined natural gas usage shall not exceed 180,000 scf/day and 56.31 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Records of daily and annual natural gas consumption shall be maintained to demonstrate compliance with each specific permit limit. [District Rules 1070, 2201, and 2520] Federally Enforceable Through Title V Permit
21. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 2520] Federally Enforceable Through Title V Permit

DRAFT

## **APPENDIX B**

### **Current PTO**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-377-40-16

EXPIRATION DATE: 10/31/2022

SECTION: NE23 TOWNSHIP: 26S RANGE: 19E

## EQUIPMENT DESCRIPTION:

18.62 MMBTU/HR NATURAL GAS-FIRED ALMOND FINISHING, FLAVORING, AND PACKAGING OPERATION WITH ONE 0.32 MMBTU/HR PLASTICIZER (WITH 32 BURNERS), THREE INCUS 2.5 MMBTU/HR DIRECT-FIRED DRYERS, ONE 3.6 MMBTU/HR PROCTOR SCHWARTZ DRYER #2 (WITH TWO BURNERS), ONE 3.6 MMBTU/HR AEROGLIDE NUT DRYER #2 (WITH TWO BURNERS) VENTED TO A CYCLONE, ONE 4.0 MMBTU/HR AEROGLIDE NUT DRYER #3 VENTED TO TWO CYCLONE ASSEMBLIES, AND ASSOCIATED PERMIT-EXEMPT EQUIPMENT

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Almond finishing and packaging operation shall be equipped with two operational non-resettable totalizing fuel meters: one serving the plasticizer and dryer serving the slicer/sliver line and one serving the two roasters, to show compliance with the fuel usage limits set forth in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Combustion equipment shall be equipped with operational non-resettable, totalizing fuel meters to demonstrate compliance with fuel consumption limits. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
5. Emissions from the Incus dryers shall not exceed any of the following limits: 10.9 lb-NOX/MMscf (as NO<sub>2</sub>), 2.85 lb-SOX/MMscf (as SO<sub>2</sub>), 2.8 lb-PM<sub>10</sub>/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions from the Proctor Schwartz #2 and Aeroglidle #2 dryers shall not exceed any of the following limits: 36.0 lb-NOX/MMscf (as NO<sub>2</sub>), 2.85 lb-SOX/MMscf (as SO<sub>2</sub>), 7.6 lb-PM<sub>10</sub>/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Proctor Schwartz #2 and Aeroglidle Dryer #2 natural gas usage shall not exceed either of the following limits: 163,200 scf/day or 37.15 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from 4 MMBtu/hr Aeroglidle #3 dryer shall not exceed any of the following limits: 83.2 lb-NOX/MMscf (as NO<sub>2</sub>), 2.85 lb-SOX/MMscf (as SO<sub>2</sub>), 2.8 lb-PM<sub>10</sub>/MMscf, 21.0 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Aeroglidle # 3 natural gas usage shall not exceed either of the following limits: 96,000 scf/day or 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the plasticizer and dryer serving the slicer/sliver line shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOX/MMscf, 5.0 lb-PM<sub>10</sub>/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Slicer and sliver lines (two plasticizers and two dryers) natural gas usage shall not exceed either of the following limits: 103,500 scf/day and 10.0 MMscf/year. [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.

12. Three 2.5 MMBtu Incus dryers' combined natural gas usage shall not exceed either of the following limits: 180,000 scf/day or 56.31 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records of daily and annual natural gas consumption shall be maintained. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit

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



## **APPENDIX C**

**Previously Issued ATC Permits (S-377-40-14 and 40-15)**



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-40-14

ISSUANCE DATE: 10/14/2014

LEGAL OWNER OR OPERATOR: PARAMOUNT FARMS  
MAILING ADDRESS: ATTN: DANIEL LEE  
13646 HIGHWAY 33  
LOST HILLS, CA 93249-9719

LOCATION: 3.5 MILES NORTH OF HWY 46 ON HWY 33  
LOST HILLS, CA

SECTION: NE23 TOWNSHIP: 26S RANGE: 19E

### EQUIPMENT DESCRIPTION:

MODIFICATION OF ALMOND FINISHING AND PACKAGING OPERATION IN BUILDING #48 INCLUDING: SORTING EQUIPMENT, MOISTURIZING LINE, PACKAGING EQUIPMENT, TWO BLANCHING LINES, BINS, TANKS, CONVEYORS, ELEVATORS AND ASSORTED HARDWARE, WITH ONE SLIVER LINE AND ONE SLICER LINE EACH WITH A 32-10,000 BTU/HR BURNER PLASTICIZER AND ONE EACH 1.2 MMBTU/HR DRYER, AND ONE ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES - THE FIRST WITH A 3-STAGE PROCTOR SCHWARTZ ROASTER IN BUILDING #50 WITH TWO 1.6 MMBTU/HR NATURAL GAS FIRED BURNERS VENTED TO TWO CYCLONE ASSEMBLIES, SALT REMOVAL SHAKER, SURGE HOPPER, BUCKET ELEVATOR VENTED TO SOCK FILTERS AND ADDITIONAL CONVEYING EQUIPMENT, THE SECOND WITH AN AEROGLIDE MODEL C1 120-65 RGC NATURAL GAS FIRED ROASTER WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE, THE THIRD WITH A 4 MMBTU/HR NUT DRYER, BIN DUMPERS, BRINE TANK, MIX TANKS, SLURRY KETTLES, SEASONING SKIDS, OSCILLATING FEEDERS AND ASSOCIATED CONVEYING EQUIPMENT: REMOVE ONE BLANCHING LINE AND ADD TWO FLAVORING LINES EACH WITH A THREE-STAGE 4.4 MMBTU/HR CPM WOLVERINE/PROCTOR NATURAL GAS-FIRED DRYER/COOLER VENTED TO A FABRIC COLLECTOR, WITH CONVEYORS, ELEVATORS AND STORAGE BINS

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjoffet, Director of Permit Services

S-377-40-14 : Oct 14 2014 1:57PM - TORID : Joint Inspection NOT Required

3. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOX emission reduction credits for the following quantity of emissions: 1st quarter - 1,035 lb, 2nd quarter - 1,035 lb, 3rd quarter - 1,035 lb, and fourth quarter - 1,035 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number C-497-2 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This almond finishing and packaging operation shall be equipped with three operational non-resettable totalizing fuel meters: one serving the slicer and sliver lines (two plasticizers and two dryers), one serving the two roasters and one serving the flavoring line's two dryers, to show compliance with the fuel usage limits set forth in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Emissions from the slicer and sliver lines (two plasticizers and two dryers) shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 5.0 lb-PM10/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The slicer and sliver lines (two plasticizers and two dryers) natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the Proctor Schwartz and Aeroglide dryers and CPM Wolverine/Proctor dryers shall not exceed any of the following limits: 36.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 7.6 lb-PM10/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The Proctor Schwartz and Aeroglide dryers' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. CPM Wolverine/Proctor dryers' combined total natural gas usage shall not exceed 0.21 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emission rate per MMscf gas burned from the 4.0 MMBtu/hr Aeroglide nut dryer #3 shall not exceed any of the following: PM10: 2.8 lb/MMscf, SOx as (SO2): 2.85 lb/MMscf, NOx (as NO2): 83.2 lb/MMscf, VOC: 3.8 lb/MMscf, or CO: 21.0 lb/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Natural gas combusted in the 4.0 MMBtu/hr Aeroglide nut dryer (#3) shall not exceed 0.096 MMscf/day nor 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of daily and annual natural gas consumption shall be maintained. [District Rules 1070, 2201 and 2520, 9.4] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 2520, 9.4] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-40-15

ISSUANCE DATE: 07/17/2015

LEGAL OWNER OR OPERATOR: PARAMOUNT FARMS  
MAILING ADDRESS: ATTN: DANIEL LEE  
13646 HIGHWAY 33  
LOST HILLS, CA 93249-9719

LOCATION: 3.5 MILES NORTH OF HWY 46 ON HWY 33  
LOST HILLS, CA

SECTION: NE23 TOWNSHIP: 26S RANGE: 19E

### EQUIPMENT DESCRIPTION:

MODIFICATION OF ALMOND FINISHING AND PACKAGING OPERATION TO REVISE AND CLARIFY EQUIPMENT DESCRIPTION WITH POST PROJECT DESCRIPTION AS FOLLOWS: 27.42 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION INCLUDING: THREE 2.5 MMBTU/HR INCUS DRYERS; THIRTY-TWO 10,000 BTU/HR PLASTICIZER BURNERS; ONE 3-STAGE PROCTOR SCHWARTZ ROASTER WITH TWO 1.6 MMBTU/HR BURNERS VENTED TO TWO CYCLONE ASSEMBLIES; ONE AEROGlide (#2) MODEL C1 120-65 RGC ROASTER WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE; ONE 4 MMBTU/HR AEROGlide (#3) NUT DRYER VENTED TO A CYCLONE; AND TWO 3-STAGE 4.4 MMBTU/HR CPM WOLVERINE/PROCTOR DRYER COOLERS VENTED TO FABRIC COLLECTORS

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct S-377-40-14 shall be implemented prior to the modifications authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Combustion equipment shall be equipped with operational non-resettable, totalizing fuel meters to demonstrate compliance with fuel consumption limits. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
Arnaud Marjollet, Director of Permit Services

S-377-40-15 - Jul 17 2015 11:09AM - AYABEJ - Joint Inspection NOT Required

5. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Emissions from the slicer/sliver line plasticizer burners shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 5.0 lb-PM10/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The slicer/sliver line plasticizer burners' natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the Proctor Schwartz, Aeroglide (#2), and CPM Wolverine/Proctor burners shall not exceed any of the following limits: 36.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 7.6 lb-PM10/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The Proctor Schwartz and Aeroglide (#2) roasters' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. CPM Wolverine/Proctor dryers' combined total natural gas usage shall not exceed 0.21 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emission rate per MMscf gas burned from the 4.0 MMBtu/hr Aeroglide (#3) nut dryer shall not exceed any of the following: PM10: 2.8 lb/MMscf, SOx as (SO2): 2.85 lb/MMscf, NOx (as NO2): 83.2 lb/MMscf, VOC: 3.8 lb/MMscf, or CO: 21.0 lb/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Natural gas combusted in the 4.0 MMBtu/hr Aeroglide (#3) nut dryer shall not exceed 0.096 MMscf/day nor 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emissions from the Incus dryer burners shall not exceed any of the following limits: 10.9 lb-NOX/MMscf (as NO2), 2.85 lb-SOX/MMscf (as SO2), 2.8 lb-PM10/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The three 2.5 MMBtu/hr Incus dryers' combined natural gas usage shall not exceed 180,000 scf/day and 56.31 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of daily and annual natural gas consumption shall be maintained. [District Rules 1070, 2201 and 2520, 9.4] Federally Enforceable Through Title V Permit
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 2520, 9.4] Federally Enforceable Through Title V Permit

## **APPENDIX D**

**QNEC**

### Quarterly Net Emissions Change (QNEC)

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

QNEC = PE2 - PE1, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
- PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

The quarterly PE2 and quarterly PE1 are calculated as follows:

$$PE2_{\text{quarterly}} = PE2_{\text{annual}} \div 4 \text{ quarters/year}$$

$$PE1_{\text{quarterly}} = PE1_{\text{annual}} \div 4 \text{ quarters/year}$$

Using the values in Sections VII.C in the evaluation above, the QNEC calculations are summarized in the following tables:

<b>QNEC Summary</b>			
<b>Pollutant</b>	<b>PE2 (lb/qtr)</b>	<b>PE1 (lb/qtr)</b>	<b>QNEC (lb/qtr)</b>
NO <sub>x</sub>	1,568.5	1,221.75	346.75
SO <sub>x</sub>	122.75	95.25	27.5
PM <sub>10</sub>	216.75	143.5	73.25
CO	2,657.0	2,454.75	202.25
VOC	200.5	147.5	53.0

**APPENDIX E**  
**Compliance Certification**





# San Joaquin Valley Air Pollution Control District



## TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

### I. TYPE OF PERMIT ACTION (Check appropriate box)

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

COMPANY NAME: Wonderful Pistachios & Almonds		FACILITY ID: S-377
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility		
2. Owner's Name:		
3. Agent to the Owner:		

### II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial applicable circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true, accurate, and complete.
- For minor modifications, this application meets the criteria for use of minor permit modification procedures pursuant to District Rule 2520.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
 Signature of Responsible Official

10/18/17  
 Date

Dave Szefflin  
 Name of Responsible Official (please print)

Vice President of Operations  
 Title of Responsible Official (please print)