



DEC 26 2018

Eric Sorensen
Ponderosa Paint Co
3663 N Clovis Ave
Fresno, CA 93727

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: C-409
Project Number: C-1172943

Dear Mr. Sorensen:

Enclosed for your review and comment is the District's analysis of Ponderosa Paint Co's application for Emission Reduction Credits (ERCs) resulting from the shutdown of the salted and roasted nut and seeds processing operation, at 5626 E. Shields Ave, Fresno. The quantity of ERCs proposed for banking is 1,850 lb-NOx/yr, 20 lb-SOx/yr, 4,162 lb-PM10/yr, 1,348 lb-CO/yr, and 170 lb-VOC/yr.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jesse A. Garcia of Permit Services at (559) 230-5918.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:jag

Enclosures

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

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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San Joaquin Valley Air Pollution Control District

ERC Banking Application Review

Shutdown of Salted and Roasted Nuts and Seeds Operation

Processing Engineer: Jesse A. Garcia
 Lead Engineer: Joven Refuerzo
 Date: October 1, 2018

Facility Name: Ponderosa Paint Co
 Mailing Address: 3663 N Clovis Ave
 Fresno, CA 93727

Contact Person: Eric Sorensen
 Telephone: (559) 291-0664
 Email: eas@ponderosapaintco.com

Application Received: October 9, 2017
 Deemed Complete: December 29, 2017

Project Number: C-1172943
 ERC Certification number: C-1463-1, -2, -3, -4, -5

I. Proposal

Ponderosa Paint Co has submitted an application for Emission Reduction Credits (ERCs) banking for the shutdown of a salted and roasted nuts and seeds manufacturing plant (C-409) that was previously owned and operated by ConAgra Foods. ConAgra Foods sold the building and all rights to the ERCs from their operation. All permits were cancelled on November 3, 2017. A copy of the surrendered Permits to Operate (PTOs) are included in Appendix I.

The quantity of bankable emission reductions for the shutdown of the salted and roasted nuts and seeds manufacturing operation is summarized in the table below:

Pollutant	1st Quarter (lb)	2nd Quarter (lb)	3rd Quarter (lb)	4th Quarter (lb)	Total (lb)
NO _x	502	502	423	423	1,850
SO _x	5	5	5	5	20
PM ₁₀	888	888	1,193	1,193	4,162
PM _{2.5} ¹	517	517	705	705	2,444
CO	362	362	312	312	1,348
VOC	45	45	40	40	170

¹ Since PAS requires the values to be entered in percentage, calculating PM2.5 percentage as PM2.5/PM10 yields the following per quarter: 1st quarter = 58.2%, 2nd quarter = 58.2%, 3rd quarter = 59.1%, 4th quarter = 59.1%.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (02/18/16)
Rule 2301 Emission Reduction Credit Banking (01/19/12)

III. Location of Reduction:

The emissions units were located at 5626 E Shields Ave in Fresno, CA.

IV. Method of Generating Reductions:

The plant production ceased and all permits were cancelled on November 3, 2017.

Equipment Description:

Copies of all permit units for which the facility requested emissions reductions are attached in Appendix I.

C-409-8-1: RAW SEED CLEANING OPERATION (LINE NO. 1) INCLUDING: FIVE SUPER-FLO CONVEYORS, FOUR BUCKET ELEVATORS, ONE WESTRUP FAU 1500 SEED CLEANER, ONE DESTONER, ONE OLIVER 3600 GRAVITY TABLE, AND ONE COLOR SORTER; ALL SERVED BY ONE SAUNCO SJTW10-224-3719 BAGHOUSE NO. 1

C-409-9-8: 12 MMBTU/HR ROASTING OPERATION (LINE NO. 1) INCLUDING: ONE NATURAL GAS-FIRED ROASTER, ONE WESTRUP FAU 1500 SEED CLEANER, AND ONE SEED SEASONING PROCESS; ALL SERVED BY A CREWS TWO-STAGE WET SCRUBBER (SHARED WITH C-409-13)

C-409-10-0: 10 HP BULK SEED UNLOADING OPERATION INCLUDING: FOUR RAW SEED STORAGE SILOS, ONE 2 HP SUPER-FLO CONVEYOR, ONE 7.5 HP BUCKET ELEVATOR, AND ONE 0.5 HP CONSIGNER (ELEVATOR TO FOUR STORAGE SILOS)

C-409-11-2: RAW SEED CLEANING OPERATION (LINE NO. 2) INCLUDING: FIVE SUPER-FLO CONVEYORS, FOUR BUCKET ELEVATORS, ONE WESTRUP FAU 1500 SEED CLEANER, ONE DESTONER, ONE OLIVER 3600 GRAVITY TABLE, AND ONE COLOR SORTER; ALL SERVED BY ONE SHICK MODEL 16TR10X224 PULSE JET CLEANING BAGHOUSE NO. 2

C-409-12-0: 12 MMBTU/HR ROASTING OPERATION (LINE NO. 2) INCLUDING: ONE GAS-FIRED ROTARY DRUM ROASTER, FANS (246.0 HP TOTAL), ONE BUCKET ELEVATOR, CONVEYORS, ONE COOLER, ONE CLIPPER 298D SEED CLEANER; SERVED BY ONE 20,000 CFM DUCON MODEL II TYPE L MULTIVANE AIR SCRUBBER NO. 2

C-409-13-3: PACKAGING OPERATION WITH FIFTEEN MACHINES, SERVED BY CREWS TWO-STAGE WET SCRUBBER (SHARED WITH C-409-9)

V. Calculations

A. Assumption:

- The results of all Historical Actual Emission (HAE) and Actual Emission Reduction (AER) calculations are rounded to the nearest whole number.
- Since permit unit -9 and -13 vent to the same scrubber listed under permit unit -9 and since the emissions from the scrubber have been source tested, the emissions from the both units will be calculated as the emission factor from the source tests multiplied times the throughput of permit unit -9 so as to not double count the emissions.

B. Emission factors:

C-409-8-1 (Raw Seed Cleaning Operation):

PM₁₀ is the only pollutant of concern emitted from this unit.

From the permit, the emissions were limited to 1.1 lb-PM₁₀/day and the throughput to 72 tons/day; therefore, the emission factor is calculated as 1.1 lb-PM₁₀/day ÷ 72 tons/day = 0.015 lb-PM₁₀/ton.

C-409-9 (12 MMBtu/hr Roasting Operation):

The following are emission factors for this operation:

Pollutant	Emission Factor		Source
NO _x	27.5 lb/MMscf (0.0275 lb/MMBtu)	2.4 ppmv @ 19% O ₂	Average of Source Tests From 2006 – 2017 (See Appendix II)
SO _x	0.6 lb/MMscf (0.0006 lb/MMBtu)		District Policy APR 1720
PM ₁₀	0.314 lb/ton		
CO	55.0 lb/MMscf (0.0550 lb/MMBtu)	7.9 ppmv @ 19% O ₂	Average of Source Tests From 2006 – 2017 (See Appendix II)
VOC	6.0 lb/MMscf (0.0060 lb/MMBtu)	1.5 ppmv @ 19% O ₂	

C-409-10-0 (Bulk Seed Unloading Operation):

PM₁₀ is the only pollutant of concern emitted from this unit.

From the permit, the emissions were limited to 8.6 lb-PM₁₀/day and the throughput from the other permit units was limited to 72 tons/day; therefore, the emission factor can be calculated as 8.6 lb-PM₁₀/day ÷ 72 tons/day = 0.12 lb-PM₁₀/ton.

C-409-11-2 (Raw Seed Cleaning Operation):

PM₁₀ is the only pollutant of concern emitted from this unit.

From the permit, the emissions were limited to 0.1 lb-PM₁₀/day and the throughput was limited to 72 tons/day; therefore, the emission factor can be calculated as 0.1 lb-PM₁₀/day ÷ 72 tons/day = 0.001 lb-PM₁₀/ton.

C-409-12-0 (12 MMBtu/hr Roasting Operation):

The following are emission factors for this operation:

Pollutant	Emission Factor	Source
NO _x	130 lb/MMscf (0.13 lb/MMBtu)	Permitted Limit of 38.4 lb/day ÷ (12 MMBtu/hr x 24 hr/day) = 0.13 lb/MMBtu
SO _x	0.69 lb/MMscf (0.00069 lb/MMBtu)	Permitted Limit of 0.2 lb/day ÷ (12 MMBtu/hr x 24 hr/day)
PM ₁₀	9.72 lb/MMscf (0.00972 lb/MMBtu)	Permitted Limit of 2.8 lb/day ÷ (12 MMBtu/hr x 24 hr/day)
CO	5.55 lb/MMscf (0.00555 lb/MMBtu)	Permitted Limit of 1.6 lb/day ÷ (12 MMBtu/hr x 24 hr/day)
VOC	2.78 lb/MMscf (0.00278 lb/MMBtu)	Permitted Limit of 0.8 lb/day ÷ (12 MMBtu/hr x 24 hr/day)

C-409-13-3 (Packaging Operation):

As explained above, since the emissions from this unit are vented through the scrubber listed under permit -9, the emissions calculated under permit -9 are representative of both units -9 and -13 and no additional emissions will be calculated for this unit.

C. Baseline Period Determination:

Section 3.9 of District Rule 2201 defines the baseline period as “two consecutive years of operation immediately prior to the submission of the complete application” or “another time period of at least two consecutive years within the five years immediately prior to the submission of the complete application if it is more representative of normal source operation”.

Since the applicant recently purchased the facility (2017) and does not have records from 2016, 2010, 2009 or 2007, the applicant proposes to use the six consecutive years of operation immediately prior to the submission of the complete application to represent normal source operation.

The facility began shutting down operation in early 2015; therefore, operation in 2015 is not representative of normal source operation in terms of throughput.

The quarterly emissions are taken from the facility's emissions inventory to establish the quarterly emission rates. The annual emissions are assumed to have been emitted evenly throughout the annual quarters since the facility is not a seasonal source (See Appendix III).

Each consecutive two-year period is compared with the ten-year normal source operating average; the two-year period that is closest to the normal source operating average is determined to be the baseline period. Using this methodology, the period most representative of normal source operation that will be used as the baseline period is 3rd quarter from 2012 – 2nd quarter 2014 (see Appendix IV of this document).

D. Historical Actual Emissions (HAE)

Historical Actual Emissions (HAEs) are emissions that actually occurred during the baseline period, after discounting for:

- Any emission reductions required or encumbered by any laws, rules, regulations, agreements, orders, or permits; and
- Any emissions reductions attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, and
- Any emission reductions proposed in the District air quality plan for attaining the annual reductions required by the California Clean Air Act, and
- Any Actual Emissions in excess of those required or encumbered by any laws, rules, regulations, orders, or permits.

1. Applicable District Rules

Pursuant to District Rule 2201, 3.23, the HAE must be discounted for any emissions reductions required or encumbered by any laws, rules, regulations, agreements, orders, or permits.

There are no District Prohibitory Rules specifically applicable to the raw seed cleaning, roasting, seed unloading or packaging operations (C-409-8 through -13).

Additionally, there are no New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to these operations.

2. State Implementation Plan (SIP)

Pursuant to District Rule 2201, 3.23, the HAE must be discounted for any emissions reductions attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan.

There are no control measures noticed for workshop, or proposed or contained in a State Implementation Plan applicable the sources in this project. Therefore, the Historical Actual Emissions will be calculated in such a manner that they are fully surplus.

3. District Air Quality Plan

Pursuant to District Rule 2201, 3.23, the HAE must be discounted for any emissions reductions proposed in the District air quality plan for attaining the annual reductions required by the California Clean Air Act.

Currently there are no emissions reductions proposed in any District air quality plans for attaining the annual reductions required by the California Clean Air Act.

4. Excess Emissions

Pursuant to District Rule 2201, 3.23, the HAE must be discounted for any Actual Emissions in excess of those required or encumbered by any laws, rules, regulations, orders, or permits.

There are no emissions in excess of those required or encumbered by any laws, rules, regulations, orders, or permits.

5. HAE Summary

The HAE is calculated in Appendix V and summarized in the following table:

Pollutant	1 st Quarter (lb)	2 nd Quarter (lb)	3 rd Quarter (lb)	4 th Quarter (lb)
NO _x	558	558	470	470
SO _x	6	6	6	6
PM ₁₀	987	987	1,326	1,326
Portion of PM ₁₀ That is PM _{2.5}	574	574	783	783
CO	402	402	347	347
VOC	50	50	44	44

E. Actual Emissions Reductions

Per District Rule 2201, section 4.12, Actual Emissions Reductions (AER) shall be calculated, on a pollutant-by-pollutant basis, as follows:

$$\text{AER} = \text{HAE} - \text{PE2}$$

Where:

HAE = Historic Actual Emissions

PE2 = Post Project Potential to Emit

Since the units have been shut down, PE2 is equal to zero. Therefore, AER is equal to HAE.

F. Air Quality Improvement Deduction

Per District Rule 2201, section 4.12.1, prior to banking, AER shall be discounted by 10% for Air Quality Improvement Deduction. Therefore, the Air Quality Improvement Deduction for emissions from the permit unit is summarized in the following table:

Pollutant	1 st Quarter (lb)	2 nd Quarter (lb)	3 rd Quarter (lb)	4 th Quarter (lb)
NO _x	56	56	47	47
SO _x	1	1	1	1
PM ₁₀	99	99	133	133
Portion of PM ₁₀ That is PM _{2.5}	57	57	78	78
CO	40	40	35	35
VOC	5	5	4	4

G. Bankable Emissions Reductions

The bankable emissions reductions are determined by subtraction of the air quality improvement deduction from the Actual Emissions Reductions. The bankable ERC of this unit is summarized in the table below:

Pollutant	1 st Quarter (lb)	2 nd Quarter (lb)	3 rd Quarter (lb)	4 th Quarter (lb)
NO _x	502	502	423	423
SO _x	5	5	5	5
PM ₁₀	888	888	1,193	1,193
Portion of PM ₁₀ That is PM _{2.5}	517	517	705	705
CO	362	362	312	312
VOC	45	45	40	40

VI. Compliance

To comply with the definition of Actual Emissions Reductions (Rule 2201, Section 3.2.1), the reduction must be:

A. Real

The emissions reductions were generated by the shutdown of the salted and roasted nuts and seeds manufacturing plant. The real emissions were calculated from actual historic production and fuel use data as well as recognized emission factors. The facility has been shutdown and all equipment have been removed from service and their permits subsequently were surrendered to the District.

Therefore, the emission reductions are real.

B. Enforceable

The reductions are enforceable since the permits for the salted and roasted nuts and seeds manufacturing operation have been surrendered to the District. Operating the equipment without permits would result in enforcement action being taken.

C. Quantifiable

The reductions are quantifiable since the reductions were calculated utilizing District-approved emission factors, and the actual baseline period production and natural gas usage.

D. Permanent

The salted and roasted nuts and seeds manufacturing operation has been shutdown and the PTOs have been surrendered. Operation of the equipment without a valid PTO is subject to enforcement action. Construction of equipment that would replace the equipment removed at this facility, regardless if constructed at the same or different location, must be authorized by the District after evaluation under all applicable rules, including District Rule 2201 (New and Modified Stationary Source Review Rule), under which any increase in emissions over the applicable threshold must be offset as described under Section VI.A above.

Additionally, the permitting database was queried to verify that the production is not being shifted elsewhere in the District and no permit applications were found to increase production of salted and roasted nuts and seeds.

Therefore, the emission reductions are permanent.

E. Surplus

Shutdown of the facility was not required by any law, rule, agreement, or regulation. As of the date this application was deemed complete, there are no known future rules or regulations that would have required any portion of these reductions. Therefore, the reductions are surplus.

F. Not used for the approval of an Authority to Construct or as Offsets

The ERCs generated by permanent shutdown of the entire facility were not used in the approval of an Authority to Construct or as offsets for any projects at the facility.

G. Timely Submittal

Pursuant to District Rule 2301, Section 4.2, in order to deem emissions reductions eligible for banking, an application for ERC has been filed no later than 180 days after the emissions reductions occurred.

Emissions from the surrendered permits permanently ceased on November 3, 2017 as this is the date the permits were surrendered. The emissions reduction banking application was received on October 9, 2017. Therefore, the application was received within 180 days of the date the reductions occurred. The ERC application was filed in a timely manner.

VII. Recommendation

Pending a successful public noticing period, issue Emission Reduction Credit Certificates for NO_x, SO_x, PM₁₀, CO, and VOC in the following amounts:

Pollutant	1st Quarter (lb)	2nd Quarter (lb)	3rd Quarter (lb)	4th Quarter (lb)	Total (lb)
NO _x	502	502	423	423	1,850
SO _x	5	5	5	5	20
PM ₁₀	888	888	1,193	1,193	4,162
Portion of PM ₁₀ That is PM _{2.5}	517	517	705	705	2,444
CO	362	362	312	312	1,348
VOC	45	45	40	40	170

Appendices

- Appendix I Surrendered Permits to Operate
- Appendix II Emission Factor Determination
- Appendix III Throughput Amounts (in the form of Emissions Inventory Statements)
- Appendix IV Baseline Period Determination
- Appendix V Historical Actual Emissions Calculations
- Appendix VI Draft Emissions Reduction Credit Certificates

Appendix I

Surrendered Permits to Operate

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-409-8-1

EXPIRATION DATE: 10/31/2018

EQUIPMENT DESCRIPTION:

RAW SEED CLEANING OPERATION (LINE NO. 1) INCLUDING: FIVE SUPER-FLO CONVEYORS, FOUR BUCKET ELEVATORS, ONE WESTRUP FAU 1500 SEED CLEANER, ONE DESTONER, ONE OLIVER 3600 GRAVITY TABLE, AND ONE COLOR SORTER; ALL SERVED BY ONE SAUNCO SJTW10-224-3719 BAGHOUSE NO. 1

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. 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]
5. 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]
6. The maximum pressure drop across the baghouse shall not exceed 6" of water column. [District NSR Rule]
7. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The raw seed cleaning operation (Line No. 1) shall not be operated unless emissions are vented through the baghouse. [District NSR Rule]
10. Daily throughput of seeds shall not exceed 72 tons per day. [District NSR Rule]
11. Particulate matter emissions from the raw seed cleaning operation (Line No. 1) shall not exceed 1.1 lb/day. [District NSR Rule]
12. Permittee shall record daily throughput of sunflower seeds, pistachios and pumpkin seeds. Records shall be retained on-site for a period of at least five years, and shall be made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-409-9-8

EXPIRATION DATE: 10/31/2018

EQUIPMENT DESCRIPTION:

12 MMBTU/HR ROASTING OPERATION (LINE NO. 1) INCLUDING: ONE NATURAL GAS-FIRED ROASTER, ONE WESTRUP FAU 1500 SEED CLEANER, AND ONE SEED SEASONING PROCESS; ALL SERVED BY A CREWS TWO-STAGE WET SCRUBBER (SHARED WITH C-409-13)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. 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]
5. The flow regulator valves to the air atomized lances, the first and second stage venturis, and the demister pad, each shall be set at the position used to demonstrate compliance during the most recent source test. [District Rule 2201]
6. The water flow regulator valve position for the air atomized lances, first and second stage venturis, and the mesh pad, shall be monitored and recorded on a weekly basis. [District Rule 2201]
7. The water flow to the air atomized lances shall be monitored by reading the rotameter on the pump skid and the result recorded weekly. [District Rule 2201]
8. If the position of a water regulator valve has deviated from the setting determined during the most recent source test, then the permittee shall take action to correct the valve position. [District Rule 2201]
9. All spray nozzles within the scrubber, including those associated with the venturis, the air atomized lances and the mesh pad, shall be inspected for blockage at least monthly. Records shall be maintained of the date of inspection, nozzle condition, and any corrective action taken. [District Rule 2201]
10. The water pressure in the water line to the scrubber must be at least 55 psi unless another pressure is determined during source testing. [District Rule 2201]
11. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201]
12. Fresh scrubber liquid shall be added continuously as necessary to maintain scrubbing efficiency. [District Rule 2201]
13. The roasting operation (Line No. 1), associated after-roast seed cleaner, and the seasoning process shall not be operated unless exhausting through the Crews two-stage wet scrubber. [District Rule 2201]
14. Daily throughput of seeds for roasting operation (Line No. 1) shall not exceed 72 tons per day. [District Rule 2201]
15. If the throughput rate exceeds that for which compliance was demonstrated during source testing, the permittee shall conduct an emission test within 60 days, utilizing District-approved test methods, to determine compliance with the applicable emissions limits at the new throughput rate. [District Rule 2201]
16. Emissions of PM10 from the Crews scrubber shall not exceed 3.12 lb/hr. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

17. The product throughput rate, in lb/hr, the fuel flow rate to the roaster, water line pressure for the scrubber, and the position of the water flow regulator valves for the scrubber shall be recorded during source testing. [District Rule 2201]
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
20. Source testing to demonstrate compliance with particulate matter emission limits shall be conducted at least once every twelve months. [District Rule 2201]
21. Source testing to determine compliance with NO_x, CO, and VOC emission limits shall be conducted every two years. [District Rule 2201]
22. EPA Method 201/201A shall be used to measure the PM₁₀ emission rate if there is no entrained water. If entrained water is significant in the exhaust, then EPA Method 5 shall be used and all PM will be considered PM₁₀. [District Rule 2201]
23. Source testing to measure NO_x emissions shall be conducted using EPA Method 7E or ARB Method 100. [District Rule 2201]
24. Source testing to measure CO emissions shall be conducted using EPA Method 10 or ARB Method 100. [District Rule 2201]
25. Source testing to measure stack gas oxygen concentration shall be conducted using EPA Method 3 or 3A, or CARB Method 100. [District Rule 2201]
26. Source testing to measure Volatile Organic Compounds (VOC) shall be conducted using EPA Method 18 and analyzed for low weight hydrocarbons. [District Rule 2201]
27. Records of daily seed process rates and fuel consumption shall be maintained. All records shall be retained on-site for a period of at least 5 years, and shall be made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-409-10-0

EXPIRATION DATE: 10/31/2018

EQUIPMENT DESCRIPTION:

10 HP BULK SEED UNLOADING OPERATION INCLUDING: FOUR RAW SEED STORAGE SILOS, ONE 2 HP SUPER-FLO CONVEYOR, ONE 7.5 HP BUCKET ELEVATOR, AND ONE 0.5 HP CONSIGNER (ELEVATOR TO FOUR STORAGE SILOS)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. 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]
5. Daily emissions shall not exceed 8.6 lbs/day of PM10. [District NSR Rule]
6. Permittee shall record daily loading from railroad cars and trucks. Records shall be maintained for a period of at least five years, and shall be made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-409-11-2

EXPIRATION DATE: 10/31/2018

EQUIPMENT DESCRIPTION:

RAW SEED CLEANING OPERATION (LINE NO. 2) INCLUDING: FIVE SUPER-FLO CONVEYORS, FOUR BUCKET ELEVATORS, ONE WESTRUP FAU 1500 SEED CLEANER, ONE DESTONER, ONE OLIVER 3600 GRAVITY TABLE, AND ONE COLOR SORTER; ALL SERVED BY ONE SHICK MODEL 16TR10X224 PULSE JET CLEANING BAGHOUSE NO. 2

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]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. 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]
5. The daily throughput of raw seeds cleaning operation (Line No. 2) shall not exceed 72 tons per day. [District NSR Rule]
6. Particulate matter emissions from the raw seed cleaning operation (Line No. 2) shall not exceed 0.1 lb/day. [District NSR Rule]
7. The raw seed cleaning operation (Line No. 2) shall not be operated unless emissions are vented through the baghouse. [District NSR Rule]
8. The baghouse exhaust fan shall be switched on prior to the start-up of raw seed cleaning operation. [District Rule 2201]
9. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
10. 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]
11. Baghouse shall operate at all times with a minimum differential pressure of 0 inch water column and a maximum differential pressure of 6 inches water column. [District Rule 2201]
12. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
13. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
14. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201]
15. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]

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

16. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201]
17. The permittee shall record daily throughput of sunflower seeds, pistachios and pumpkin seeds processed. [District Rule 2201]
18. All records shall be retained on-site for a period of at least 5 years, and shall be made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-409-12-0

EXPIRATION DATE: 10/31/2018

EQUIPMENT DESCRIPTION:

12 MMBTU/HR ROASTING OPERATION (LINE NO. 2) INCLUDING: ONE GAS-FIRED ROTARY DRUM ROASTER, FANS (246.0 HP TOTAL), ONE BUCKET ELEVATOR, CONVEYORS, ONE COOLER, ONE CLIPPER 298D SEED CLEANER; SERVED BY ONE 20,000 CFM DUCON MODEL II TYPE L MULTIVANE AIR SCRUBBER NO. 2

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. 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]
5. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201]
6. The scrubber must have a water flow rate of 42 gallons per minute and a pressure drop of at least 6" water column. [District NSR Rule]
7. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201]
8. Fresh scrubber liquid shall be added continuously as necessary to maintain scrubbing efficiency. [District NSR Rule]
9. The roasting operation (Line No. 2) shall not be operated unless emissions are vented through the scrubber. [District NSR Rule]
10. Rotary Drum Roaster (Line No. 2) shall be fired on natural gas only. [District NSR Rule]
11. Daily throughput of seeds shall not exceed 72 tons per day. [District NSR Rule]
12. Daily emissions shall not exceed any of the following limits: 2.8 lb PM10/day, 0.2 lb SOx/day, 38.4 lb NOx/day, 0.8 lb VOC/day, or 1.6 lb CO/day. [District NSR Rule]
13. Permittee shall record daily seed process rates and fuel consumption. These records shall be retained on-site for a period of at least five years, and shall be made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-409-13-3

EXPIRATION DATE: 10/31/2018

EQUIPMENT DESCRIPTION:

PACKAGING OPERATION WITH FIFTEEN MACHINES, SERVED BY CREWS TWO-STAGE WET SCRUBBER (SHARED WITH C-409-9)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. 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]
5. The packaging operation shall not be operated unless exhausting through the Crews two-stage wet scrubber. [District Rule 2201]
6. The total daily processing rate for packaging shall not exceed 144 tons of finished sunflower, pumpkin and pistachio seeds, combined. [District Rule 2201]
7. The Crews two-stage wet scrubber shall be operated in the manner described in permit conditions for permit unit #C-409-9. [District Rule 2201]
8. Emissions of PM10 from the Crews scrubber shall not exceed 3.12 lb/hr. [District Rule 2201]
9. Total combined emissions from the Crews scrubber (shared with unit #C-409-9) shall not exceed any of the following limits: 38.4 lb NOx/day, 22.7 lb VOC/day, or 31.2 lb CO/day. [District Rule 2201]
10. The product packaging rate, in lb/hr, shall be recorded during source testing. [District Rule 2201]
11. Source testing to demonstrate compliance with the permitted emission rates shall be performed as detailed in permit conditions for permit unit #C-409-9, and shall be conducted when the packaging line is operational. [District Rule 2201]
12. Records of daily seed process rates shall be maintained. All records shall be retained on-site for a period of at least 5 years, and shall be made available for District inspection upon request. [District Rule 1070]

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

Appendix II

Emission Factor Determination

Source Test Results for Permit Units C-409-9 & -13

Source Test Date	Emission Factor (lb-PM10/ton)	Throughput During Test (tons/hr)	Source Test Results (lb/hr)	Emission Factor (ppmv @ 19% O2)		
				PM10	NOx	CO
03/07/2017	0.696	2.8	1.95	--	--	--
03/08/2016	0.388	2.6	1.01	1.8	7.5	1.5
03/10/2015	0.416	2.5	1.04	--	--	--
03/04/2014	0.085	2.7	0.23	2.5	8.0	1.5
02/19/2013	0.189	2.7	0.51	--	--	--
03/20/2012	0.217	2.9	0.63	2.1	8.5	1.5
03/01/2011	0.170	2.7	0.46	--	--	--
02/23/2010	0.310	2.9	0.90	2.6	6.8	1.5
03/03/2009	0.261	2.8	0.73	--	--	--
03/03/2008	0.529	2.8	1.48	2.7	8.4	1.5
02/13/2007	0.286	2.9	0.83	--	--	--
05/09/2006	0.217	2.9	0.63	2.5	7.9	1.5
Average	0.314			2.4	7.9	1.5

ppm=>btu

	SELECTION #
COAL (ANTHRACITE)	0
COAL (BITUMINOUS)	1
COAL (LIGNITE)	2
OIL (CRUDE, RESIDUAL, OR DISTILLATE)	3
GAS (NATURAL)	4
GAS (PROPANE)	5
GAS (BUTANE)	6
WOOD	7
WOOD BARK	8
MUNICIPAL SOLID WASTE	9

STANDARD O2 CORRECTION FOR EXTERNAL COMBUSTION IS 3%	
Type of fuel (use table above)	4 GAS
O2 correction (i.e., 3%)	19 %
Enter concentrations	
NOx	2.4 ppmv
CO	7.9 ppmv
VOC (as methane)	1.5 ppmv

CALCULATED EQUIVALENT LB/MMBTU VALUES	
NOx	0.0275 LB/MMBTU
CO	0.0550 LB/MMBTU
VOC (as methane)	0.0060 LB/MMBTU

pV = R*T	
pressure (p)	1 atm
universal gas constant (R*)	0.7302 atm-scf/lbmole-oR
temperature (oF)	60 oF
calculated	
molar specific volume (V)	379.5 scf/lbmole
Molecular weights	
NOx	46 lb/lb-mole
CO	28 lb/lb-mole
VOC (as methane)	16 lb/lb-mole

F FACTORS FROM EPA METHOD 19		
COAL (ANTHRACITE)	10100 DSCF/MMBTU	COAL
COAL (BITUMINOUS)	9780 DSCF/MMBTU	COAL
COAL (LIGNITE)	9860 DSCF/MMBTU	COAL
OIL (CRUDE, RESIDUAL, OR DISTILLATE)	9190 DSCF/MMBTU	OIL
GAS (NATURAL)	8710 DSCF/MMBTU	GAS
GAS (PROPANE)	8710 DSCF/MMBTU	GAS
GAS (BUTANE)	8710 DSCF/MMBTU	GAS
WOOD	9240 DSCF/MMBTU	WOOD
WOOD BARK	9600 DSCF/MMBTU	WOOD BARK
MUNICIPAL SOLID WASTE	9570 DSCF/MMBTU	SOLID WASTE
F FACTOR USED IN CALCULATIONS	8710 DSCF/MMBTU	GAS

ConAgra Foods
Crews Wet Scrubber Source Test Emission Results
May 9, 2006

	Run #1	Run #2	Run #3	Average
Total Particulate				
(As PM-10)				
gr/dscf	0.0026	0.0031	0.0027	0.0028
lbs/hr	0.59	0.69	0.62	0.63
Stack Gas Flow Rates				
Vs	26.26	25.37	26.14	25.92
Acfm	30,937	29,893	30,796	30,542
Dscfm	26,810	25,777	26,463	26,350
Isokinetic Variation (%)	99.1	97.9	98.8	98.6
Oxides of Nitrogen				
ppmv	2.7	2.3	2.5	2.5
lbs/hr	0.53	0.43	0.48	0.48
lbs/day	12.6	10.4	11.6	11.5
Carbon Monoxide				
ppmv	8.2	7.8	7.7	7.9
lbs/hr	0.97	0.89	0.90	0.92
lbs/day	23.4	21.4	21.7	22.1
Oxygen (%)	20.0	19.9	20.2	20.0
Carbon Dioxide (%)	0.7	0.6	0.8	0.70
Reactive Organic Compounds				
ppmv	< 1.5	< 1.5	< 1.5	< 1.5
lbs/hr	< 0.44	< 0.42	< 0.43	< 0.43
lbs/day	< 10.6	< 10.2	< 10.4	< 10.4

Source Test R#1 Original Pounds per Hour

Date	ID	Batch #	Processor	Shift	Sample Time	Lbs	Time	Pounds/Hour
5/9/2006	5091	129303	CHAHAR	3rd Shift	3:58	790	480	5,925.00
5/9/2006	5092	129106	Richard V	1st Shift	6:43	714	480	5,355.00
5/9/2006	5093	129108	Richard V	1st Shift	8:51	803	480	6,022.50
5/9/2006	5094	129113	Richard V	1st Shift	13:55	769	480	5,767.50
5/9/2006	5095	129216	Rene P	2nd Shift	16:39	783	480	5,872.50
5/9/2006	5096	129218	Rene P	2nd Shift	18:48	789	480	5,917.50
5/9/2006	5097	129322	CHAHAR	3rd Shift	22:51	798	480	5,985.00

Summary for 5/9/2006

Average Pound / Hour 5,835.00

Date	ID	Batch #	Processor	Shift	Sample Time	Lbs	Time	Pounds/Hour
5/10/2006	5098	130303	CHAHAR	3rd Shift	3:04	787	480	5,902.50
5/10/2006	5099	130106	Richard V	1st Shift	5:51	899	457	7,081.84
5/10/2006	5100	130106	Richard V	1st Shift	6:08	869	495	6,320.00
5/10/2006	5101	130108	Richard V	1st Shift	8:07	835	480	6,262.50

Summary for 5/10/2006

Average Pound / Hour 6,391.71

Summary for all dates in range

Average Pound / Hour 6,037.44

ConAgra Foods
Crews Wet Scrubber Source Test Emission Results
February 13, 2007

	Run #1	Run #2	Run #3	Average	Limit
Total Particulate (As PM-10)	gr/dscf	0.0046	0.0028	0.0018	0.0031 ✓
	lbs/hr	1.12	0.91	0.47	0.83 ✓ 3.12
Stack Gas Flow Rates					
Vs	27.52	36.14	28.69	30.78	
Acfm	32,421	42,576	33,796	36,264 ✓	
Dscfm	28,354	37,547	30,110	32,004 ✓	
Isokinetic Variation (%)	101.0	101.5	100.7	101.1 ✓	
Oxygen (%)	20.4	20.2	20.3	20.3 ✓	
Carbon Dioxide (%)	0.78	0.91	0.71	0.80 ✓	

RateID	Date	Batch Number	Processor Name	Shift	Time of Sample	Lbs	Time	Expr1	Expr2
6295	2/13/2007	44300	Chahar	3rd Shift	0:41	794	480	5,955.00	30.23
6296	2/13/2007	44303	Chahar	3rd Shift	3:07	792	480	5,940.00	30.30
6297	2/13/2007	44304	Chahar	3rd Shift	4:44	778	480	5,835.00	30.85
6298	2/13/2007	44106	Onie E	1st Shift	6:42	730	480	5,475.00	32.88
6299	2/13/2007	44107	Onie E	1st Shift	7:46	755	480	5,662.50	31.79
6300	2/13/2007	44109	Onie E	1st Shift	9:01	852	480	6,390.00	28.17
6301	2/13/2007	44111	Onie E	1st Shift	11:12	745	420	6,385.71	28.19
6302	2/13/2007	44214	Ernie B	2nd	14:04	740	480	5,550.00	32.43
6303	2/13/2007	44216	Ernie B	2nd	16:03	752	480	5,640.00	31.91
6304	2/13/2007	44218	Ernie B	2nd	18:03	736	480	5,520.00	32.61
6305	2/13/2007	44220	Ernie B	2nd	20:01	828	480	6,210.00	28.99
6306	2/13/2007	44322	Chahar	3rd Shift	22:17	765	480	5,737.50	31.37

70,300.2 lb ÷ 12

5858.4 lb/hr

70.3 tons/day

ConAgra Foods
Crews Wet Scrubber Source Test Emission Results
March 3, 2008

	Run #1	Run #2	Run #3	Average	Limit
Total Particulate (As PM-10)					
gr/dscf	0.0037 ✓	0.0059 ✓	0.0061 ✓	0.0052 ✓	
lbs/hr	1.05 ✓	1.64 ✓	1.75 ✓	1.48 ✓	3.12
Stack Gas Flow Rates					
Vs	32.22	32.16	33.62	32.67 ✓	
Acfm	37,960	37,887	39,605	38,484 ✓	
Dscfm	33,074	32,540	33,489	33,034 ✓	
Isokinetic Variation (%)	100.3	101.9	103.4	101.9 ✓	
Oxides of Nitrogen					
ppmv	2.6	2.8	2.8	2.7 ✓	
lbs/hr	0.63	0.65	0.68	0.66 ✓	
lbs/day	15.1	15.7	16.4	15.7 ✓	38.4
Carbon Monoxide					
ppmv	8.6	7.9	8.7	8.4 ✓	
lbs/hr	1.26	1.13	1.29	1.23 ✓	
lbs/day	30.3	27.2	31.0	29.5 ✓	31.2
Oxygen (%)	20.82	20.93	20.76	20.84 ✓	
Carbon Dioxide (%)	0.64	0.63	0.62	0.63	
Reactive Organic Compounds					
ppmv	< 1.5	< 1.5	< 1.5	< 1.5	< 5.4
lbs/hr	< 0.57	< 0.56	< 0.58	< 0.57	< 0.45
lbs/day	< 13.7	< 13.5	< 14.0	< 13.8	< 10.9 22.7

Source Test R#1 Original Pounds per Hour

Date	ID	Batch #	Processor	Shift	Sample Time	Lbs	Time	Pounds/Hour
3/3/2008	8198	63304	Victor	3rd Shift	4:06	815	480	6,112.50
3/3/2008	8199	63305	Victor	3rd Shift	5:34	814	480	6,105.00
3/3/2008	8200	63106	Richard A	1st Shift	6:50	624	480	4,680.00
3/3/2008	8201	63106	Richard A	1st Shift	6:56	707	480	5,302.50
3/3/2008	8202	63109	Richard A	1st Shift	9:02	779	480	5,842.50
3/3/2008	8203	63111	Richard A	1st Shift	11:32	745	480	5,587.50
3/3/2008	8204	63113	Richard A	1st Shift	13:27	735	480	5,512.50
3/3/2008	8205	63214	Ernie. B	2nd Shift	14:42	730	480	5,475.00
3/3/2008	8206	63216	Ernie. B	2nd Shift	16:47	770	480	5,775.00
3/3/2008	8207	63218	Ernie. B	2nd Shift	18:36	782	480	5,865.00
3/3/2008	8208	63220	Ernie. B	2nd Shift	20:39	765	480	5,737.50
3/3/2008	8209	63322	Victor	3rd Shift	22:23	780	480	5,850.00
Summary for 3/3/2008						Average Pound / Hour		5,653.75
Summary for all dates in range						Average Pound / Hour		5,653.75



AIR TESTING

A Division of **Justice & Associates**

ConAgra Foods Crews Wet Scrubber Source Test Emission Results March 3, 2009

	Run #1	Run #2	Run #3	Average
Total Particulate				
(As PM-10) gr/dscf	0.0047	0.0021	0.0020	0.0029 ✓
lbs/hr	1.15	0.55	0.48	0.73 ✓
Stack Gas Flow Rates				
Vs	27.21	27.74	27.63	27.53
Acfm	32,058	32,681	32,553	32,431
Dscfm	28,452	29,838	28,136	28,809 ✓
Isokinetic Variation (%)	101.8	106.9	109.8	106.2
Oxygen (%)	21.2	20.8	20.9	21.0
Carbon Dioxide (%)	0.40	0.45	0.42	0.42

Source Test - Original Pounds Per Hour

Date	ID	Batch #	Processor	Shift	Sample Time	Lbs	Time	Pounds/Hour
3/3/2009	9613	62300	Chahar	3rd Shift	0:49	735	480	5,512.50
3/3/2009	9614	62303	Chahar	3rd Shift	3:28	755	480	5,662.50
3/3/2009	9615	62305	Chahar	3rd Shift	5:30	708	480	5,310.00
3/3/2009	9616	62106	Richard A	1st Shift	6:19	784	480	5,880.00
3/3/2009	9617	62108	Richard A	1st Shift	8:09	755	480	5,662.50
3/3/2009	9618	62110	Richard A	1st Shift	10:48	661	480	4,957.50
3/3/2009	9619	62112	Richard A	1st Shift	12:07	780	480	5,850.00
3/3/2009	9620	62214	Ernie. B	2nd Shift	14:05	757	480	5,677.50
3/3/2009	9621	62216	Ernie. B	2nd Shift	16:04	691	480	5,182.50
3/3/2009	9622	62218	Ernie. B	2nd Shift	18:10	771	480	5,782.50
3/3/2009	9623	62220	Ernie. B	2nd Shift	20:03	732	480	5,490.00
3/3/2009	9625	62322	Chahar	3rd Shift	22:22	720	480	5,400.00
Summary for 3/3/2009						Average Pound / Hour		5,530.63

ConAgra Foods
Crews Wet Scrubber Source Test Emission Results
March 1, 2010

	Run #1	Run #2	Run #3	Average	Limit
Total Particulate					
(As PM-10)					
gr/dscf	0.0041	0.0031	0.0039	0.0037 ✓	0.1
lbs/hr	0.97	0.77	0.97	0.90 ✓	3.12
Stack Gas Flow Rates					
Vs	27.41	28.94	28.62	28.32	
Acfm	32,294	34,094	33,718	33,369	
Dscfm	27,535 ✓	28,631 ✓	28,980 ✓	28,382	
Isokinetic Variation (%)	109.6 ✓	106.2 ✓	105.0 ✓	106.9	
Oxides of Nitrogen					
ppmv	2.8	2.5	2.6	2.6	
lbs/hr	0.56	0.53	0.55	0.55 ✓	
lbs/day	13.5	12.7	13.1	13.1 ✓	38.4
Carbon Monoxide					
ppmv	7.0	6.8	6.8	6.8	
lbs/hr	0.85	0.86	0.87	0.86 ✓	
lbs/day	20.4	20.6	20.9	20.7 ✓	31.2
Oxygen (%)	20.58	20.52	20.29	20.46 ✓	
Carbon Dioxide (%)	0.56	0.58	0.57	0.57	
Reactive Organic Compounds					
ppmv	< 1.5	< 1.5	< 1.5	< 1.5	
lbs/hr	< 0.50 0.11	< 0.54 0.11	< 0.52 0.11	< 0.52 0.11	< 0.11
lbs/day	< 12.0 2.52	< 13.0 2.62	< 12.6 2.65	< 12.5 2.59	22.7

Rate checks

Mc Clannan, Don (Supply Chain Snacks) [Don.McClannan@conagrafoods.com]

Sent: Friday, March 05, 2010 12:43 PM

To: Gabor Lazar

qrySourceTest										
RateID	Date	Batch_Number	Processor_Name	Shift	Time_of_Sample	Lbs	Time	Expr1	Expr2	Comments
11334	3/1/2010	60106	Richard V	1st Shift	6:10	779	480	5,842.50	30.81	
11335	3/1/2010	60113	Richard V	1st Shift	13:05	841	537	5,637.99	31.93	
11336	3/1/2010	60214	Rene P	2nd Shift	14:52	778	480	5,835.00	30.85	
11337	3/1/2010	6021	Rene P	2nd Shift	17:42	788	480	5,910.00	30.46	
11338	3/1/2010	60220	Rene P	2nd Shift	20:21	769	480	5,767.50	31.21	
11339	3/1/2010	60323	Chahar	3rd Shift	23:04	776	480	5,820.00	30.93	

Valve position and pressure were the same.
 LBs rate is in column "Expr1"

	<p>Don McClannan Senior Project Engineer/Maintenance Mgr. Snacks Division 5626 E. Shields Ave. Fresno, CA 93727 559.291.0231 ext.228 f: 559.291.5607 don.mcclannan@conagrafoods.com</p>
	<p>Food I love: David Seeds</p>

ConAgra Foods

Crews Wet Scrubber Source Test Emission Results

March 1, 2011

	Run #1	Run #2	Run #3	Average
Total Particulate				
(As PM-10) gr/dscf	0.0036 ✓	0.0011 ✓	0.0010 ✓	0.0019 ✓
lbs/hr	0.83 ✓	0.27 ✓	0.27 ✓	0.46 0.458
Stack Gas Flow Rates				
Vs	26.06	27.16	28.26	27.16
Acfm	30,699 ✓	32,003 ✓	33,290 ✓	31,997 ✓
Dscfm	27,171 ✓	28,477 ✓	29,701 ✓	28,450 ✓
Isokinetic Variation (%)	101.0 ✓	100.9 ✓	102.6 ✓	101.5
Oxygen (%)	19.94	20.01	20.38	20.11 ✓
Carbon Dioxide (%)	0.44	0.55	0.29	0.43 ✓

RateID	Date	Batch Number	Processor Name	Shift	Time of Sample	Lbs	Time
12965	3/1/2011	60106	Richard A	1st Shift	6:44	741	480
12966	3/1/2011	60108	Richard A	1st Shift	8:29	735	480
12967	3/1/2011	60110	Richard A	1st Shift	9:33	661	480
12968	3/1/2011	60112	Richard A	1st Shift	12:04	728	480
12969	3/1/2011	60214	Joe R	2nd Shift	14:44	738	480

(Note: Time column = 480 seconds, Lbs column = Lbs per 480 seconds)

720.6 lb/8 min

5,405 lb/hr



ConAgra Foods
Crews Wet Scrubber Source Test Emission Results
March 20, 2012

	Run #1	Run #2	Run #3	Average	Limit
Total Particulate					
(As PM-10)					
gr/dscf	0.0025	0.0022	0.0024	0.0024 ✓	0.1
lbs/hr	0.68	0.57	0.63	0.63 ✓	3.12
Stack Gas Flow Rates					
Vs	29.8	29.1	29.0	29.3	
Acfm	35,078	34,328	34,168	34,524	
Dscfm	31,114	30,479	30,393	30,662 ✓	
Isokinetic Variation (%)	98.5	101.0	101.3	100.3 ✓	
Oxides of Nitrogen					
ppmv	2.2	1.9	2.0	2.1	
lbs/hr	0.49	0.43	0.45	0.46 ✓	
lbs/day	11.85	10.34	10.86	11.02 ✓	38.4
Carbon Monoxide					
ppmv	8.2	9.6	7.9	8.5	
lbs/hr	1.13	1.29	1.06	1.16 ✓	
lbs/day	27.02	31.05	25.41	27.83 ✓	31.2
Oxygen (%)	20.7	20.5	20.5	20.6 ✓	
Carbon Dioxide (%)	0.4	0.4	0.4	0.4 ✓	
Reactive Organic Compounds					
ppmv	< 1.5	< 1.5	< 1.5	< 1.5	
lbs/hr	< 0.55	< 0.54	< 0.53	< 0.54 0.12	
lbs/day	< 13.15	< 12.91	< 12.81	< 12.96 2.80 22.7	

Rate ID	Date	Batch Number	Processor Name	Shift	Time of Sample	Lbs	Time	Expr1	Expr2
14534	3/20/2012	80300	Victor	2nd Shift	0:49	758	480	5,685.00	31.66
14535	3/20/2012	80302	Richard V	3rd Shift	2:16	772	480	5,790.00	31.09
14536	3/20/2012	80106	Joe R	1st Shift	6:57	771	480	5,782.50	31.13
14537	3/20/2012	80109	Joe R	1st Shift	9:53	766	480	5,745.00	31.33
14538	3/20/2012	80112	Joe R	1st Shift	12:20	770	480	5,775.00	31.17
14539	3/20/2012	80214	Rene P	2nd Shift	14:01	759	480	5,692.50	31.62
14540	3/20/2012	80216	Rene P	2nd Shift	16:16	765	480	5,737.50	31.37
14541	3/20/2012	80217	Rene P	2nd Shift	17:59	758	480	5,685.00	31.66
14542	3/20/2012	80218	Rene P	2nd Shift	18:43	781	480	5,857.50	30.73
14543	3/20/2012	80322	Irma Cortes	3rd Shift	22:29	738	480	5,535.00	32.52

5730 R/WP

ConAgra Foods

Crews Wet Scrubber Source Test Emission Results

March 12, 2013

	Run #1	Run #2	Run #3	Average
Total Particulate				
(As PM-10) gr/dscf	0.0016	0.0019	0.0022	0.0019 ✓
lbs/hr	0.44	0.51	0.58	0.51 ✓
Stack Gas Flow Rates				
Vs	30.34	29.43	29.02	29.60
Acfm	35,745	34,674	34,183	34,867 ✓
Dscfm	31,774	30,744	30,556	31,024 ✓
Isokinetic Variation (%)	102.3	103.8	102.4	102.8 ✓
Oxygen (%)	20.1	20.1	20.1	20.1
Carbon Dioxide (%)	0.5	0.5	0.4	0.5

@ 2.667 tons/hr
 PM = 0.192 lb-PM10/ton

ConAgra Foods
Crews Wet Scrubber
3/12/2013

Production Data

Rate ID	Date	Batch Number	Processor Name	Shift	Time of Sample	Lbs	Time	Expr 1	Expr 2
15636	3/12/2013	71106	Ernie. B	1st Shift	6:05	647	480	4,852.50	37.09
15637	3/12/2013	71108	Ernie. B	1st Shift	8:04	725	480	5,437.50	33.10
15638	3/12/2013	71110	Ernie. B	1st Shift	10:04	716	480	5,370.00	33.52
15639	3/12/2013	71112	Ernie. B	1st Shift	12:04	671	480	5,032.50	35.77
15640	3/12/2013	71214	Victor	2nd Shift	14:07	733	480	5,487.50	32.74

(Note: Time column = 480 seconds, Lbs column = Lbs per 480 seconds)

5334.375

2.667 tons / hr

8:32 - 09:54

10:22 - 11:59

12:22 - 13:44



ConAgra Foods
Crews Wet Scrubber Source Test Emission Results
March 4, 2014

	Run #1	Run #2	Run #3	Average	Limit
Total Particulate (As PM-10)					
gr/dscf	0.00097	0.00058	0.0010	0.00086	-
lbs/hr	0.26	0.15	0.27	0.23	-
lbs/day	6.29	3.70	6.60	5.53	3.12
lb/ton	0.095	0.058	0.101	0.085	-
Stack Gas Flow Rates					
Vs	30.4	29.8	30.6	30.3	-
Acfm	35,801	35,131	35,995	35,642	-
Dscfm	31,688	30,880	31,407	31,325 ✓	-
Isokinetic Variation (%)	104.7	101.5	101.8	102.7 ✓	-
Oxides of Nitrogen					
ppmv	2.4	2.4	2.5	2.5 ✓	-
lbs/hr	0.56	0.55	0.57	0.56 ✓	-
lbs/day	13.53	13.19	13.74	13.49 ✓	38.4
Carbon Monoxide					
ppmv	8.4	8.0	7.6	8.0 ✓	-
lbs/hr	1.18	1.09	1.06	1.11 ✓	-
lbs/day	28.25	26.21	25.49	26.65 ✓	31.2
Oxygen (%)	18.2	19.8	19.6	19.2 ✓	-
Carbon Dioxide (%)	0.4	0.4	0.4	0.4 ✓	-
Reactive Organic Compounds					
ppmv	<1.5	<1.5	<1.5	<1.5	-
lbs/hr	<0.55	0.12	<0.54	0.12	<0.54
lbs/day	<13.16	2.89	<12.84	2.82	<13.07
					2.87
					2.86
					22.7

ConAgra Foods Production Data - 4 March 2014 - Fresno, CA

RateID	Date	Batch Number	Processor Name	Shift	Time of Sample	Lbs	Time
16638	3/4/2014	63106	Richard V	1st Shift	6:48	714	480
16639	3/4/2014	63108	Richard V	1st Shift	8:14	723	465
16640	3/4/2014	63110	Richard V	1st Shift	10:12	797	540
16641	3/4/2014	63113	Richard V	1st Shift	13:20	730	480
16642	3/4/2014	63215	IRMA	2nd Shift	15:06	709	480

IRMA @ 12:06

$$\frac{723 \text{ lb}}{465 \text{ sec}} \times \frac{3600 \text{ sec}}{1 \text{ hr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 2.709 \text{ ton/hr}$$

$$\frac{797 \text{ lb}}{540 \text{ sec}} \times \frac{3600 \text{ sec}}{1 \text{ hr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 2.607 \text{ ton/hr}$$

$$\frac{730 \text{ lb}}{480 \text{ sec}} \times \frac{3600 \text{ sec}}{1 \text{ hr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 2.738 \text{ ton/hr}$$

avg 2.731 ton/hr

- 1 8:14 9:21
- 2 10:12 11:12
- 3 12:06 - 13:06



ConAgra Foods Crews Wet Scrubber Source Test Emission Results March 10, 2015

	Run #1	Run #2	Run #3	Average	Allowable
Total Particulate					
(As PM-10) gr/dscf	0.0055	0.0039	0.0034	0.0043 ✓	0.1
lbs/hr	1.36	0.96	0.81	1.04 ✓	3.12
	1.362	0.955	0.821	1.046	
Stack Gas Flow Rates					
Vs	27.3	27.4	26.4	27.0	-
Acfm	32,112	32,312	31,087	31,837	-
Dscfm	28,706	28,722	27,588	28,339 ✓	-
Isokinetic Variation (%)	103.9	103.0	102.7	103.2 ✓	-
Oxygen (%)	19.9	19.9	20.2	20.0	-
Carbon Dioxide (%)	0.3	0.3	0.3	0.3	-

Process rate 2.482 tons/hr

PM/ton = 0.421 lb-PM/ton

Production Rate For 10 March 2015 Compliance Test

Date	Processor Name	Shift	Time of Sample	Lbs	Rate - Lbs/hr
3/10/2015	Ernie B	1st Shift	8:04:00 AM	826.00	4,956.00
Date	Processor Name	Shift	Time of Sample	Lbs	Rate - Lbs/hr
3/10/2015	Ernie B	1st Shift	10:04:00 AM	742.00	4,946.67
Date	Processor Name	Shift	Time of Sample	Lbs	Rate - Lbs/hr
3/10/2015	Ernie B	1st Shift	12:19:00 PM	729.00	4,989.35

avg 4964.16/hr



ConAgra Foods
Crews Wet Scrubber Source Test Emission Results
March 8, 2016

	Run #1	Run #2	Run #3	Average	Limit
Total Particulate (As PM-10)					
gr/dscf	0.0055	0.0030	0.0032	0.0039 ✓	0.1 ✓
lbs/hr	1.42	0.76	0.83	1.00 1.01 ✓	3.12 ✓
lbs/day	0.55	0.29	0.32	0.39	
Stack Gas Flow Rates					
Vs	28.0	27.6	28.1	27.9	
Acfm	33,004	32,552	33,046	32,868	
Dscfm	29,841	29,431	29,901	29,724 29,790	
Isokinetic Variation (%)	103.5	103.9	101.9	103.1 102.9	
Oxides of Nitrogen					
ppmv	1.0	2.1	2.2	1.8 ✓	
lbs/hr	0.22	0.46	0.48	0.39	
lbs/day	5.29	11.04	11.56	9.30 9.2	38.4 ✓
Carbon Monoxide					
ppmv	7.6	7.4	7.4	7.5 ✓	
lbs/hr	1.01	0.97	0.98	0.98	
lbs/day	24.16	23.18	23.46	23.60 ✓	31.2 ✓
Oxygen (%)	20.2	19.8	20.3	20.1 ✓	
Carbon Dioxide (%)	0.4	0.4	0.4	0.4 ✓	
Reactive Organic Compounds					
ppmv	< 1.5	< 1.5	< 1.5	< 1.5 ✓	
lbs/hr	< 0.51	< 0.50	< 0.51	< 0.51 0.11	
lbs/day	< 12.27	< 12.10	< 12.29	< 12.22 2.72	22.7 ✓

ConAgra Foods Production Data - 8 March 2016 - Fresno, CA

Rate ID	Date	Batch Number	Processor Name	Shift	Time of Sample	Lbs	Time	lbs/hr
18336	3/8/2016	68110	Irma C	1st Shift	10:45	736	480	5,520
18337	3/8/2016	68214	Irma C	2nd Shift	14:13	648	480	4,860
18338	3/8/2016	68217	Irma C	2nd Shift	17:17	687	480	5,153

(Note: Time column = 480 seconds, Lbs column = Lbs per 480 seconds)

5520 2.76 tons/hr
 4860 2.43 tons/hr
 avg. 2.60 tons/hr

Reliable Emission Measurements Inc.

Phone: (559) 855-8402 Fax: (559) 841-3665

**ConAgra Foods
Fresno
Emission Summary
3/7/2017
C-409-13-3**

	Run 1	Run 2	Run 3	Average	<i>Limits</i>	
Total Particulate						
Total gr/dscf	0.0080	0.0094	0.0052	0.0075	0.1	
Total lbs/hr	2.12	2.41	1.34	1.953	3.12	
Total lb/ton	0.72	0.94	0.47	0.710		
Oxygen						
O2 %	20.20	20.07	-	20.1		
Carbon Monoxide						
CO2 %	0.85	0.75	-	0.80		
Cyclone Flow-Rates						
Vs	30.57	30.30	30.14	30.34		
Acfm	36,018	35,697	35,509	35,741		
Dscfm	30,969	29,905	30,110	30,328		
Isokinetic Variation (%)	103.89	93.40	98.98	98.8	90<I<110	
Production Rate						
lb/hr	5868.00	5107.50	5730.00	5568.50		
tons/hr	2.93	2.55	2.87	2.78		
Valve Number	1	2	3	4	5	6
Valve Postion	9:00	1:00	90°	90°	90°	90°
Water Pressure	55 psig					



3/07/17 production data

Don.McClannanJr@conagra.com <Don.McClannanJr@conagra.com>
To: John Copp <John.Copp@valleyair.org>
Cc: "Cam Donnahoo (reminc.cam@gmail.com)" <reminc.cam@gmail.com>

Tue, Apr 18, 2017 at 8:38 AM

My apologies John, here is the data you requested for the source test conducted on 3/7/2017.

RateID	Date	Batch_Number	Processor_Name	Shift	Time_of_Sample	Lbs	Time	Lbs. per hr.
18889	3/7/2017	66106	Ernie B	1st Shift	6:38	782	480	5,865.00
18890	3/7/2017	66108	Ernie B	1st Shift	8:37	681	480	5,107.50
18891	3/7/2017	66111	Ernie B	1st Shift	11:05	764	480	5,730.00

Conagra Foods

Crews Wet Scrubber

3/7/2017

Test Data	
Valve No.	Valve Position
1	9:00
2	1:00
3	90°
4	90°
5	90°
6	90°
Water Pressure	55psig

Appendix III

Throughput Amounts (in the form of Emissions Inventory Statements)

Facility Emissions Summary

Inventory Year: 2011 County: 10 Facility ID: 409
 Facility Name: CONAGRA FOODS, SNACK FOODS GRP

Device: 8 Device Name: SEED CLEANING LINES

Process: 1 Process Description: SEED CLEANING LINES #1

Process Rate: 9963. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	7.47E-02	9.98E-06	District - Permit limit (1.1lb-PM10/day; 72 tons throughput/day)	

Device: 9 Device Name: ROASTING LINE #1

Process: 1 Process Description: ROASTING LINE #1 - NATURAL GAS ROASTER

Process Rate: 34.12 Units: MILLION CUBIC FEET BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.17E+02	2.00E+00	2.70E-04	Source Test - 5/9/06 (7.9ppm@20%O2)	
42603	Oxides of Nitrogen	5.92E+01	1.01E+00	1.36E-04	Source Test - 5/9/06 (2.5ppm@20%O2)	
16113	Reactive Organic Gas	1.28E+01	2.18E-01	2.94E-05	Source Test - 5/9/06 (<1.5ppm@20%O2)	
42401	Sulfur Dioxide	6.00E-01	1.02E-02	1.38E-06	AP42	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Process: 2 Process Description: ROASTING LINE - SEED SEASONING PROCESS

Process Rate: 9963. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo
85101	Particulate Matter 10	2.16E-01	1.08E+00	1.44E-04	Source Test - 5/9/06 [(0.63 lb/hr)/(2.9 tons/hr)]
					1/2 App Deg

Device: 10 Device Name: BULK SEED UNLOADING OPERATION

Process: 1 Process Description: BULK SEED UNLOADING OPERATION

Process Rate: 9963. Units: TONS GRAIN PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo
85101	Particulate Matter 10	1.20E-01	5.98E-01	7.98E-05	District - Based on Day Limit (8.6 b/Day) / (24hr/day) / (3 tons/hr)
					1/2 App Deg

Device: 11 Device Name: RAW SEED CLEANING OPERATION (LINE NO. 2)

Process: 1 Process Description: RAW SEED CLEANING OPERATION (LINE NO. 2)

Process Rate: 4492. Units: TONS OF GRAIN RECEIVED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo
85101	Particulate Matter 10	1.50E-02	3.37E-02	4.50E-06	District - Based on Day Limit (1.1 lb/day) / (72 tons/day)
					1/2 App Deg

Device: 12 Device Name: ROASTER #2

Process: 1 Process Description: NATURAL GAS ROASTER

Process Rate: 14.62 Units: MILLION CUBIC FEET BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo
					1/2 App Deg

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

42101	Carbon Monoxide	5.55E+00	4.06E-02	3.33E-05	District - Based on Day Limit (1.6 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
42603	Oxides of Nitrogen	1.33E+02	9.75E-01	8.00E-04	District - Based on Day Limit (38.4 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
85101	Particulate Matter 10	9.72E+00	7.11E-02	5.83E-05	District - Based on Day Limit (2.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
16113	Reactive Organic Gas	2.78E+00	2.03E-02	1.67E-05	District - Based on Day Limit (0.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
42401	Sulfur Dioxide	6.90E-01	5.04E-03	4.14E-06	District - Based on Day Limit (0.2 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)

Device: 13 Device Name: PACKAGING OPERATION

Process: 1 Process Description: SUNFLOWER & PUMPKIN SEED PACKAGING

Process Rate: 14456.5 Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo
85101	Particulate Matter 10	2.16E-01	1.56E+00	7.81E-04	Source Test - 5/09/06 [(0.63 lb/hr) / (2.9 tons/hr)]

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

CONFIDENTIAL

Facility Emissions Summary

Inventory Year: 2012 County: 10 Facility ID: 409
Facility Name: CONAGRA FOODS, SNACK FOODS GRP

Device: 8 Device Name: Seed Cleaning Line #1

Process: 1 Process Description: Seed Cleaning Line #1

Process Rate: 13247. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	9.94E-02	1.33E-05	District - Permit limit (1.1lb-PM10/day; 72 tons throughput/day)	

Device: 9 Device Name: 12 MMBtu/hr NG-Fired Roasting Line #1

Process: 1 Process Description: 12 MMBtu/hr NG-Fired Roasting Line #1

Process Rate: 19.77 Units: MILLION CUBIC FEET BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.17E+02	1.16E+00	7.04E-04	Source Test - 5/9/06 (7.9ppm@20%O2)	
42603	Oxides of Nitrogen	5.92E+01	5.85E-01	3.55E-04	Source Test - 5/9/06 (2.5ppm@20%O2)	
16113	Reactive Organic Gas	1.28E+01	1.26E-01	7.68E-05	Source Test - 5/9/06 (<1.5ppm@20%O2)	
42401	Sulfur Dioxide	6.00E-01	5.93E-03	3.60E-06	AP42	

Process: 2 Process Description: ROASTING LINE - SEED SEASONING PROCESS

Process Rate: 13247. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	2.16E-01	1.43E+00	1.90E-04	Source Test - 5/9/06 [(0.63 lb/hr)/(2.9 tons/hr)]	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Device: 10 **Device Name: Bulk Seed Unloading**

Process: 1 **Process Description: Bulk Seed Unloading**

Process Rate: 17663. **Units: TONS GRAIN PROCESSED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.20E-01	1.06E+00	1.42E-04	District - Based on Day Limit (8.6 lb/Day) / (24hr/day) / (3 tons/hr)	

Device: 11 **Device Name: Seed Cleaning Line #2**

Process: 1 **Process Description: Seed Cleaning Line #2**

Process Rate: 6067. **Units: TONS OF GRAIN RECEIVED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	4.55E-02	6.08E-06	District - Based on Day Limit (1.1 lb/day) / (72 tons/day)	

Device: 12 **Device Name: 12 MMBtu/hr NG-Fired Roasting Line #2**

Process: 1 **Process Description: 12 MMBtu/hr NG-Fired Roasting Line #2**

Process Rate: 9.05 **Units: MILLION CUBIC FEET BURNED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	5.55E+00	2.51E-02	3.33E-05	District - Based on Day Limit (1.6 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	
42603	Oxides of Nitrogen	1.33E+02	6.03E-01	8.00E-04	District - Based on Day Limit (38.4 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	
85101	Particulate Matter 10	9.72E+00	4.40E-02	5.83E-05	District - Based on Day Limit (2.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	
16113	Reactive Organic Gas	2.78E+00	1.26E-02	1.67E-05	District - Based on Day Limit (0.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	
42401	Sulfur Dioxide	6.90E-01	3.12E-03	4.14E-06	District - Based on Day Limit (0.2 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	

Device: 13 **Device Name: Packaging Operation**

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Process: 1 **Process Description: SUNFLOWER & PUMPKIN SEED PACKAGING**

Process Rate: 19314. **Units: TONS PROCESSED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	2.16E-01	2.09E+00	2.79E-04	Source Test - 5/09/06 [(0.63 lb/hr) / (2.9 tons/hr)]	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.



SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

1990 E. Gettysburg Ave., Fresno, CA 93726

(559) 230 - 6000 FAX: (559) 230 - 6061

District BCode 7

SURVEY FOR THE ANNUAL EMISSION INVENTORY : 2012

CONAGRA FOODS, ACCOUNTS PAYABLE

PO BOX 642210

OMAHA, NE 68164

FACILITY ID# : C-409

TAD # : 10-409

SIC # : 2068

PHONE # : (209) 291-0231

TOXID : 410

US Form Required: No

SITE ADDRESS : 5626 E SHIELDS AVENUE, FRESNO

Is this information considered:

- CONFIDENTIAL
- NOT CONFIDENTIAL

Note: All requests for confidentiality must be supported by a written justification (Title 17, section 91010, California Administrative Code)

WorkSheet for Permit # : C-409-13-3

PACKAGING OPERATION WITH FIFTEEN MACHINES, SERVED BY CREWS TWO-STAGE WET SCRUBBER (SHARED WITH C-409-9)

GENERAL MATERIAL PROCESSING & HANDLING

Annual Process Data:

Materials Processed/Handled	Annual Quantity (include units)
SUNFLOWER SEED	17,663 TONS
PUMPKIN SEED	1,651 TONS

Waste or By-Products Generated	Annual Quantity (include units)
Ø	
Ø	

Operating Schedule:

For equipment with regular operating schedule:

Hours/Day: 24 Days/Week: 5-6 Weeks/Year: 52

For equipment that is not operated regularly:

Estimated annual operating hours: _____

Distance to Nearest Business from Equipment 250 (feet)

Distance to Nearest Residence from Equipment 1650 (feet)

Comments: _____

CONFIDENTIAL

Facility Emissions Summary

Inventory Year: 2013 County: 10 Facility ID: 409
 Facility Name: CONAGRA FOODS, SNACK FOODS GRP

Device: 8 Device Name: Seed Cleaning Line #1

Process: 1 Process Description: Seed Cleaning Line #1

Process Rate: 8025. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	6.02E-02	8.03E-06	District - Permit limit (1.1lb-PM10/day: 72 tons throughput/day)	

Device: 9 Device Name: 12 MMBtu/hr NG-Fired Roasting Line #1

Process: 1 Process Description: 12 MMBtu/hr NG-Fired Roasting Line #1

Process Rate: 28.83 Units: MILLION CUBIC FEET BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.17E+02	1.69E+00	7.04E-04	Source Test - 5/9/06 (7.9ppm@20%O2)	
42603	Oxides of Nitrogen	5.92E+01	8.53E-01	3.55E-04	Source Test - 5/9/06 (2.5ppm@20%O2)	
16113	Reactive Organic Gas	1.28E+01	1.85E-01	7.68E-05	Source Test - 5/9/06 (<1.5ppm@20%O2)	
42401	Sulfur Dioxide	6.00E-01	8.65E-03	3.60E-06	AP42	

Process: 2 Process Description: Roasting Line - Seed Seasoning Process

Process Rate: 8025. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	2.16E-01	8.67E-01	1.16E-04	Source Test - 5/9/06 [(0.63 lb/hr)/(2.9 tons/hr)]	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Device: 10 **Device Name: Bulk Seed Unloading**

Process: 1 **Process Description: Bulk Seed Unloading**

Process Rate: 10700. **Units: TONS GRAIN PROCESSED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.20E-01	6.42E-01	8.57E-05	District - Based on Day Limit (8.6 lb/Day) / (24hr/day) / (3 tons/hr)	

Device: 11 **Device Name: Seed Cleaning Line #2**

Process: 1 **Process Description: Seed Cleaning Line #2**

Process Rate: 4211. **Units: TONS OF GRAIN RECEIVED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	3.16E-02	4.20E-06	District - Based on Day Limit (1.1 lb/day) / (72 tons/day)	

Device: 12 **Device Name: 12 MMBtu/hr NG-Fired Roasting Line #2**

Process: 1 **Process Description: 12 MMBtu/hr NG-Fired Roasting Line #2**

Process Rate: 9.61 **Units: MILLION CUBIC FEET BURNED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	5.55E+00	2.67E-02	3.33E-05	District - Based on Day Limit (1.6 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	
42603	Oxides of Nitrogen	1.33E+02	6.41E-01	8.00E-04	District - Based on Day Limit (38.4 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	
85101	Particulate Matter 10	9.72E+00	4.67E-02	5.83E-05	District - Based on Day Limit (2.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	
16113	Reactive Organic Gas	2.78E+00	1.34E-02	1.67E-05	District - Based on Day Limit (0.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	
42401	Sulfur Dioxide	6.90E-01	3.32E-03	4.14E-06	District - Based on Day Limit (0.2 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)	

Device: 13 **Device Name: Packaging Operation**

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Process: 1 Process Description: Sunflower & Pumpkin Seed Packaging

Process Rate: 12236. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	2.16E-01	1.32E+00	1.76E-04	Source Test - 5/09/06 [(0.63 lb/hr) / (2.9 tons/hr)]	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

CONFIDENTIAL

Facility Emissions Summary

Inventory Year: 2014 County: 10 Facility ID: 409
 Facility Name: CONAGRA FOODS, SNACK FOODS GRP

Device: 8 Device Name: Seed Cleaning Line #1

Process: 1 Process Description: Seed Cleaning Line #1

Process Rate: 7467. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	5.60E-02	8.03E-06	District Permit limit (1.1lb-PM10/day; 72 tons throughput/day)	

Device: 9 Device Name: 12 MMBtu/hr NG-Fired Roasting Line #1

Process: 1 Process Description: 12 MMBtu/Hr NG-Fired Roasting Line #1

Process Rate: 27.27 Units: MILLION CUBIC FEET BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.17E+02	1.60E+00	7.04E-04	Source Test - 5/9/06 (7.9ppm@20%O2)	
42603	Oxides of Nitrogen	5.92E+01	8.07E-01	3.55E-04	Source Test - 5/9/06 (2.5ppm@20%O2)	
16113	Reactive Organic Gas	1.28E+01	1.75E-01	7.68E-05	Source Test - 5/9/06 (<1.5ppm@20%O2)	
42401	Sulfur Dioxide	6.00E-01	8.18E-03	3.60E-06	AP42	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Process: 2 Process Description: Roasting Line - Seed Seasoning Process
Process Rate: 8025. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	2.16E-01	8.67E-01	1.16E-04	Source Test - 5/9/06 [(0.63 lb/hr)/(2.9 tons/hr)]	

Device: 10 Device Name: Bulk Seed Unloading

Process: 1 Process Description: Bulk Seed Unloading

Process Rate: 9302. Units: TONS GRAIN PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.20E-01	5.58E-01	8.57E-05	District - Based on Day Limit (8.6 b/Day) / (24hr/day) / (3 tons/hr)	

Device: 11 Device Name: Seed Cleaning Line #2

Process: 1 Process Description: Seed Cleaning Line #2

Process Rate: 3469. Units: TONS OF GRAIN RECEIVED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	2.60E-02	4.20E-06	District - Based on Day Limit (1.1 lb/day) / (72 tons/day)	

Device: 12 Device Name: 12 MMBtu/hr NG-Fired Roasting Line #2

Process: 1 Process Description: 12 MMBtu/Hr NG-Fired Roasting Line #2

Process Rate: 12.83 Units: MILLION CUBIC FEET BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

42101	Carbon Monoxide	5.55E+00	3.56E-02	3.33E-05	District - Based on Day Limit (1.6 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
42603	Oxides of Nitrogen	1.33E+02	8.56E-01	8.00E-04	District - Based on Day Limit (38.4 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
85101	Particulate Matter 10	9.72E+00	6.24E-02	5.83E-05	District - Based on Day Limit (2.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
16113	Reactive Organic Gas	2.78E+00	1.78E-02	1.67E-05	District - Based on Day Limit (0.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
42401	Sulfur Dioxide	6.90E-01	4.43E-03	4.14E-06	District - Based on Day Limit (0.2 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)

Device: 13 **Device Name: Packaging Operation**

Process: 1 **Process Description: Sunflower & Pumpkin Seed Packaging**

Process Rate: 10936. **Units: TONS PROCESSED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	2.16E-01	1.18E+00	1.76E-04	Source Test - 5/09/06 [(0.63 lb/hr) / (2.9 tons/hr)]	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

CONFIDENTIAL

Facility Emissions Summary

Inventory Year: 2015 County: 10 Facility ID: 409
Facility Name: CONAGRA FOODS, SNACK FOODS GRP-SPCLT DIV

Device: 8 Device Name: Seed Cleaning Line #1

Process: 1 Process Description: Seed Cleaning Line #1

Process Rate: 6870. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	5.15E-02	6.88E-06	District Permit limit (1.1lb-PM10/day, 72 tons throughput/day)	

Device: 9 Device Name: 12 MMBtu/hr NG-Fired Roasting Line #1

Process: 1 Process Description: 12 MMBtu/Hr NG-Fired Roasting Line #1

Process Rate: 24.47 Units: MILLION CUBIC FEET BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.17E+02	1.43E+00	7.04E-04	Source Test - 5/9/06 (7.9ppm@20%O2)	
42603	Oxides of Nitrogen	5.92E+01	7.24E-01	3.55E-04	Source Test - 5/9/06 (2.5ppm@20%O2)	
16113	Reactive Organic Gas	1.28E+01	1.57E-01	7.68E-05	Source Test - 5/9/06 (<1.5ppm@20%O2)	
42401	Sulfur Dioxide	6.00E-01	7.34E-03	3.60E-06	AP42	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Process: 2 Process Description: Roasting Line - Seed Seasoning Process

Process Rate: 6870. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	2.16E-01	7.42E-01	9.90E-05	Source Test - 5/9/06 [(0.63 lb/hr)/(2.9 tons/hr)]	

Device: 10 Device Name: Bulk Seed Unloading

Process: 1 Process Description: Bulk Seed Unloading

Process Rate: 8860. Units: TONS GRAIN PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.20E-01	5.32E-01	7.10E-05	District - Based on Day Limit (8.6 b/Day) / (24hr/day) / (3 tons/hr)	

Device: 11 Device Name: Seed Cleaning Line #2

Process: 1 Process Description: Seed Cleaning Line #2

Process Rate: 3668. Units: TONS OF GRAIN RECEIVED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	1.50E-02	2.75E-02	3.68E-06	District - Based on Day Limit (1.1 lb/day) / (72 tons/day)	

Device: 12 Device Name: 12 MMBtu/hr NG-Fired Roasting Line #2

Process: 1 Process Description: 12 MMBtu/Hr NG-Fired Roasting Line #2

Process Rate: 7.69 Units: MILLION CUBIC FEET BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
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Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons

Monday, May 16, 2016

42101	Carbon Monoxide	5.55E+00	2.13E-02	3.33E-05	District - Based on Day Limit (1.6 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
42603	Oxides of Nitrogen	1.33E+02	5.13E-01	8.00E-04	District - Based on Day Limit (38.4 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
85101	Particulate Matter 10	9.72E+00	3.74E-02	5.83E-05	District - Based on Day Limit (2.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
16113	Reactive Organic Gas	2.78E+00	1.07E-02	1.67E-05	District - Based on Day Limit (0.8 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)
42401	Sulfur Dioxide	6.90E-01	2.65E-03	4.14E-06	District - Based on Day Limit (0.2 lb/Day) / (24hr/day) / (0.012 MMSCF/hr)

Device: 13 Device Name: Packaging Operation

Process: 1 Process Description: Sunflower & Pumpkin Seed Packaging

Process Rate: 10190. Units: TONS PROCESSED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo
85101	Particulate Matter 10	2.16E-01	1.10E+00	1.47E-04	Source Test - 5/09/06 [(0.63 lb/hr) / (2.9 tons/hr)]

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Appendix IV

Baseline Period Determination

Normal Source Operation Determination

Non-Seasonal Source (Snack Food Production)		
Calendar Quarter	Seeds Packaged (tons/qtr)	
2006	13,200	do not use
2007	0	do not use
2008	12,400	do not use
2009	0	do not use
2010	0	do not use
2011	14,500	
2012	19,300	
2013	12,200	
2014	10,900	
2015	10,200	
2016	0	
2017	N/A	
NSO Average	11,183	

Baseline Period Determination

Non-Seasonal Source (Snack Food Production)					
Calendar Quarter	Seeds Packaged (tons/qtr)	8-Qtr Block Differences vs NSO	12-Qtr Block Differences vs NSO	16-Qtr Block Differences vs NSO	20-Qtr Block Differences vs NSO
Q3 - 2012	4,825	This value is the smallest "difference" compared to the Normal Source Operation (NSO) average. Therefore, the 8 consecutive quarters associated with it (Q3 2012 - Q2 2014) most closely represent NSO. As such, the baseline period is Q3 2012 - Q2 2014.			
Q4 - 2012	4,825				
Q1 - 2013	3,050				
Q2 - 2013	3,050				
Q3 - 2013	3,050				
Q4 - 2013	3,050				
Q1 - 2014	2,725				
Q2 - 2014	2,725				
Q3 - 2014	2,725	8,033			
Q4 - 2014	2,725	8,296			
Q1 - 2015	2,550	8,358			
Q2 - 2015	2,550	8,421	8,029		
Q3 - 2015	2,550	8,483	8,219		
Q4 - 2015	2,550	8,546	8,408		
Q1 - 2016	0	8,886	8,663		
Q2 - 2016	0	9,227	8,917	8,499	
Q3 - 2016	0	9,568	9,171	8,801	
Q4 - 2016	0	9,908	9,425	9,102	
Q1 - 2017	0	10,227	9,652	9,293	
Q2 - 2017	0	10,546	9,879	9,483	9,036
NSO Average	11,183				

Appendix V

Historical Actual Emissions Calculations

Historical Actual Emission (HAE) for Permit C-409-8

PM₁₀:

$HAE_{PM10} = \text{Emission Factor (lb-PM}_{10}\text{/ton)} \times \text{Throughput (tons/qtr)}$

Typical calculation is shown below:

2012 3rd qtr = 0.015 lb-PM₁₀/ton x 3,312 tons/qtr = 50 lb-PM₁₀/qtr

The remaining calculations are summarized in the following tables:

2012 HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	50	50
2013 HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
30	30	30	30
2014 HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
28	28	n/a	n/a
Average HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
29	29	40	40

Historical Actual Emission (HAE) for Permit C-409-9

NO_x:

$$HAE_{NOx} = \text{Emission Factor (lb-NOx/MMscf)} \times \text{Throughput (MMscf/qtr)}$$

Typical calculation is shown below:

$$2012 \text{ 3}^{rd} \text{ qtr} = 27.5 \text{ lb-NOx/MMscf} \times 4.94 \text{ MMscf/qtr} = 290 \text{ lb-NOx/qtr}$$

The remaining calculations are summarized in the following tables:

2012 HAE (lb-NOx/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	136	136
2013 HAE (lb-NOx/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
198	198	198	198
2014 HAE (lb-NOx/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
187	187	n/a	n/a
Average HAE (lb-NOx/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
193	193	167	167

SO_x:

$$HAE_{SOx} = \text{Emission Factor (lb-SOx/MMscf)} \times \text{Throughput (MMscf/qtr)}$$

Typical calculation is shown below:

$$2012 \text{ 3}^{rd} \text{ qtr} = 0.6 \text{ lb-SOx/MMscf} \times 4.94 \text{ MMscf/qtr} = 3 \text{ lb-SOx/qtr}$$

The remaining calculations are summarized in the following tables:

2012 HAE (lb-SOx/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	3	3
2013 HAE (lb-SOx/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
4	4	4	4
2014 HAE (lb-SOx/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
4	4	n/a	n/a
Average HAE (lb-SOx/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
4	4	4	4

PM₁₀:

$HAE_{PM10} = \text{Emission Factor (lb-PM}_{10}\text{/ton)} \times \text{Throughput (tons/qtr)}$

Typical calculation is shown below:

2012 3rd qtr = 0.314 lb-PM₁₀/ton x 3,312 tons/qtr = 1,040 lb-PM₁₀/qtr

The remaining calculations are summarized in the following tables:

2012 HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	1,040	1,040
2013 HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
630	630	630	630
2014 HAE (lb-PM10/qtr)²			
1st qtr	2nd qtr	3rd qtr	4th qtr
630	630	n/a	n/a
Average HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
630	630	835	835

CO:

$HAE_{CO} = \text{Emission Factor (lb-CO/MMscf)} \times \text{Throughput (MMscf/qtr)}$

Typical calculation is shown below:

2012 3rd qtr = 55.0 lb-CO/MMscf x 4.94 MMscf/qtr = 578 lb-CO/qtr

The remaining calculations are summarized in the following tables:

2012 HAE (lb-CO/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	272	272
2013 HAE (lb-CO/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
396	396	396	396
2014 HAE (lb-CO/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
375	375	n/a	n/a
Average HAE (lb-CO/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
386	386	334	334

² Although the annual throughput was reported as 8,025 tons of seeds processed per year, the throughput used for this unit is the same as was reported for unit -8 for this year of 7,467 tons of seeds processed per year since the amount of seeds processed cannot be higher than the amount of seeds cleaned.

VOC:

$$HAE_{VOC} = \text{Emission Factor (lb-VOC/MMscf)} \times \text{Throughput (MMscf/qtr)}$$

Typical calculation is shown below:

$$2012 \text{ 3}^{\text{rd}} \text{ qtr} = 6.0 \text{ lb-VOC/MMscf} \times 4.94 \text{ MMscf/qtr} = 63 \text{ lb-VOC/qtr}$$

The remaining calculations are summarized in the following tables:

2012 HAE (lb-VOC/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	30	30
2013 HAE (lb-VOC/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
43	43	43	43
2014 HAE (lb-VOC/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
41	41	n/a	n/a
Average HAE (lb-VOC/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
42	42	37	37

Historical Actual Emission (HAE) for Permit C-409-10

PM₁₀:

$HAE_{PM_{10}} = \text{Emission Factor (lb-PM}_{10}\text{/ton)} \times \text{Throughput (tons/qtr)}$

Typical calculation is shown below:

2012 3rd qtr = 0.12 lb-PM₁₀/ton x 4,416 tons/qtr = 530 lb-PM₁₀/qtr

The remaining calculations are summarized in the following tables:

2012 HAE (lb-PM₁₀/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	530	530
2013 HAE (lb-PM₁₀/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
321	321	321	321
2014 HAE (lb-PM₁₀/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
279	279	n/a	n/a
Average HAE (lb-PM₁₀/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
300	300	426	426

Historical Actual Emission (HAE) for Permit C-409-11

PM₁₀:

$HAE_{PM10} = \text{Emission Factor (lb-PM}_{10}\text{/ton)} \times \text{Throughput (tons/qtr)}$

Typical calculation is shown below:

2012 3rd qtr = 0.001 lb-PM₁₀/ton x 1,517 tons/qtr = 2 lb-PM₁₀/qtr

The remaining calculations are summarized in the following tables:

2012 HAE (lb-PM₁₀/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	2	2
2013 HAE (lb-PM₁₀/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
1	1	1	1
2014 HAE (lb-PM₁₀/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
1	1	n/a	n/a
Average HAE (lb-PM₁₀/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
1	1	2	2

Historical Actual Emission (HAE) for Permit C-409-12

NO_x:

$$HAE_{NOx} = \text{Emission Factor (lb-NO}_x\text{/MMscf)} \times \text{Throughput (MMscf/qtr)}$$

Typical calculation is shown below:

$$2012 \text{ 3}^{\text{rd}} \text{ qtr} = 130 \text{ lb-NO}_x\text{/MMscf} \times 2.26 \text{ MMscf/qtr} = 294 \text{ lb-NO}_x\text{/qtr}$$

The remaining calculations are summarized in the following tables:

2012 HAE (lb-NO_x/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	294	294
2013 HAE (lb-NO_x/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
312	312	312	312
2014 HAE (lb-NO_x/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
417	417	n/a	n/a
Average HAE (lb-NO_x/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
365	365	303	303

SO_x:

$$HAE_{SOx} = \text{Emission Factor (lb-SO}_x\text{/MMscf)} \times \text{Throughput (MMscf/qtr)}$$

Typical calculation is shown below:

$$2012 \text{ 3}^{\text{rd}} \text{ qtr} = 0.69 \text{ lb-SO}_x\text{/MMscf} \times 2.26 \text{ MMscf/qtr} = 2 \text{ lb-SO}_x\text{/qtr}$$

The remaining calculations are summarized in the following tables:

2012 HAE (lb-SO_x/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	2	2
2013 HAE (lb-SO_x/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
2	2	2	2
2014 HAE (lb-SO_x/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
2	2	n/a	n/a
Average HAE (lb-SO_x/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
2	2	2	2

PM₁₀:

$$HAE_{PM10} = \text{Emission Factor (lb-PM}_{10}\text{/MMscf)} \times \text{Throughput (MMscf/qtr)}$$

Typical calculation is shown below:

$$2012 \text{ 3}^{\text{rd}} \text{ qtr} = 9.72 \text{ lb-PM}_{10}\text{/MMscf} \times 2.26 \text{ MMscf/qtr} = 22 \text{ lb-PM}_{10}\text{/qtr}$$

The remaining calculations are summarized in the following tables:

2012 HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	22	22
2013 HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
23	23	23	23
2014 HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
31	31	n/a	n/a
Average HAE (lb-PM10/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
27	27	23	23

CO:

$$\text{HAE}_{\text{CO}} = \text{Emission Factor (lb-CO/MMscf)} \times \text{Throughput (MMscf/qtr)}$$

Typical calculation is shown below:

$$2012 \text{ 3rd qtr} = 5.55 \text{ lb-CO/MMscf} \times 2.26 \text{ MMscf/qtr} = 13 \text{ lb-CO/qtr}$$

The remaining calculations are summarized in the following tables:

2012 HAE (lb-CO/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	13	13
2013 HAE (lb-CO/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
13	13	13	13
2014 HAE (lb-CO/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
18	18	376	376
Average HAE (lb-CO/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
16	16	13	13

VOC:

$HAE_{voc} = \text{Emission Factor (lb-VOC/MMscf)} \times \text{Throughput (MMscf/qtr)}$

Typical calculation is shown below:

$2012\ 3^{rd}\ qtr = 2.78\ \text{lb-VOC/MMscf} \times 2.26\ \text{MMscf/qtr} = 6\ \text{lb-VOC/qtr}$

The remaining calculations are summarized in the following tables:

2012 HAE (lb-VOC/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
n/a	n/a	6	6
2013 HAE (lb-VOC/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
7	7	7	7
2014 HAE (lb-VOC/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
9	9	n/a	n/a
Average HAE (lb-VOC/qtr)			
1st qtr	2nd qtr	3rd qtr	4th qtr
8	8	7	7

Historical Actual Emission (HAE) for NOx for All Units

HAE NOx (lb/qtr)				
Permit Unit	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
C-409-9	193	193	167	167
C-409-12	365	365	303	303
Total NOx	558	558	470	470

Historical Actual Emission (HAE) for SOx for All Units

HAE SOx (lb/qtr)				
Permit Unit	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
C-409-9	4	4	4	4
C-409-12	2	2	2	2
Total SOx	6	6	6	6

Historical Actual Emission (HAE) for PM for All Units

HAE PM10 (lb/qtr)					
Permit Unit	PM2.5/PM10 Fraction ³	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
C-409-8	28.85%	29	29	40	40
C-409-9	100%	630	630	835	835
C-409-10	28.85%	300	300	426	426
C-409-11	28.85%	1	1	2	2
C-409-12	100%	27	27	23	23
Total PM10		987	987	1,326	1,326

HAE PM2.5 (lb/qtr)					
Permit Unit	PM2.5/PM10 Fraction	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
C-409-8	28.85%	9	9	19	19
C-409-9	100%	418	418	574	574
C-409-10	28.85%	87	87	123	123
C-409-11	28.85%	33	33	44	44
C-409-12	100%	27	27	23	23
Total PM2.5		574	574	783	783

Historical Actual Emission (HAE) for CO for All Units

HAE CO (lb/qtr)				
Permit Unit	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
C-409-9	386	386	334	334
C-409-12	16	16	13	13
Total CO	402	402	347	347

³ Pursuant to 2016 Ozone SIP Planning Inventory v1.01

Historical Actual Emission (HAE) for VOC for All Units

HAE VOC (lb/qtr)				
Permit Unit	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
C-409-9	42	42	37	37
C-409-12	8	8	7	7
Total VOC	50	50	44	44

Appendix VI

Draft Emissions Reductions Credit Certificates

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate

DRAFT
C-1463-1

ISSUED TO: PONDEROSA PAINT CO

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 5626 E SHIELDS AVE
FRESNO, CA 93727

For VOC Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
45 lbs	45 lbs	40 lbs	40 lbs

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Salted and Roasted Nuts and Seeds Operation

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Samir Sheikh, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate

DRAFT
C-1463-2

ISSUED TO: PONDEROSA PAINT CO

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 5626 E SHIELDS AVE
FRESNO, CA 93727

For NOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
502 lbs	502 lbs	423 lbs	423 lbs

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Salted and Roasted Nuts and Seeds Operation

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Samir Sheikh, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate

DRAFT
C-1463-3

ISSUED TO: PONDEROSA PAINT CO

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 5626 E SHIELDS AVE
FRESNO, CA 93727

For CO Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
362 lbs	362 lbs	312 lbs	312 lbs

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Salted and Roasted Nuts and Seeds Operation

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Samir Sheikh, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate

DRAFT
C-1463-4

ISSUED TO: PONDEROSA PAINT CO

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 5626 E SHIELDS AVE
FRESNO, CA 93727

For PM10 Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
888 lbs	888 lbs	1,193 lbs	1,193 lbs

Portion of above PM10 Reductions that is PM2.5:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
58.2%	58.2%	59.1%	59.1%
517 lbs	517 lbs	705 lbs	705 lbs

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Salted and Roasted Nuts and Seeds Operation

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Samir Sheikh, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

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Emission Reduction Credit Certificate

C-1463-5

ISSUED TO: PONDEROSA PAINT CO

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 5626 E SHIELDS AVE
FRESNO, CA 93727

For SOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
5 lbs	5 lbs	5 lbs	5 lbs

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Salted and Roasted Nuts and Seeds Operation

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services