



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

MAY 27 2010

Phil Feebeck  
Gilroy Foods  
705 E, Whitmore Ave  
Modesto, CA 95352

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)  
District Facility # N-1787  
Project # N-1100285**

Dear Mr. Feebeck:

Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The facility is proposing to modify their dry parsley processing operation.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,


David Warner  
Director of Permit Services

Enclosures  
cc: Vanesa Gonzalez, Permit Services

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

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
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Bakersfield, CA 93308-9725  
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MAY 26 2010

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**  
**District Facility # N-1787**  
**Project # N-1100285**

Dear Mr. Rios:

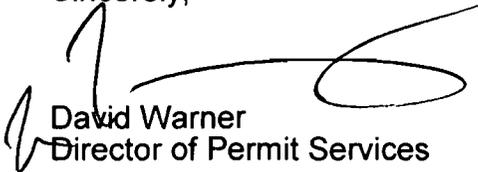
Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Gilroy Foods, located at 705 E. Whitmore Ave., CA, which has been issued a Title V permit. Gilroy Foods is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The facility is proposing to modify their dry parsley processing operation.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # N-1787-12-4 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures  
cc: Vanesa Gonzalez, Permit Services

**Seyed Sadredin**  
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**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
Dry Parsley Handling

Facility Name:	Gilroy Foods	Date:	April 29, 2010
Mailing Address:	705 E Whitmore Ave Modesto, CA 95352	Engineer:	Vanesa Gonzalez
Contact Person:	Phil Feebeck	Lead Engineer:	Joven Refuerzo
Telephone:	(209) 538-5554		
Fax:	(209) 538-5511		
E-Mail:	<u><a href="mailto:Phil.feebeck@conagrafoods.com">Phil.feebeck@conagrafoods.com</a></u>		
Application #:	N-1787-12-4		
Project #:	N-1100285		
Deemed Complete:	March 22, 2010		

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## **I. Proposal**

Gilroy Foods has requested an Authority to Construct (ATC) permit for the modification of their dry parsley processing operation, unit N-1787-12 (Appendix A). The facility is proposing to modify the processing line as follows:

- add brush reel #1 to primary stem/leaf separation operation. Rename the existing brush reel as brush reel #2.
- Install an additional Accrodent rotary separation unit equipped with a dust collection hood. Install two dust collection hoods over two additional conveyor transfer points associated with the installation of the new rotary separation unit. The dust hoods serving the existing and new Accrodent rotary separation units, and hoods serving the associated conveyor transfer points will be disconnected from the existing 60 inch cyclone and vented to a new Torit 36-20 cyclone.
- Install an additional Oliver gravity separator including a dust collection hood vented to the existing 60 inch cyclone.

The facility is not proposing any increase in throughput or change in emission factors. The proposed modifications are being made to increase production efficiency and to improve working environment.

Gilroy Foods received their Title V Permit on August 31, 2004. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, 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. Gilroy Foods must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC issued with this project.

## II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (9/21/06)  
Rule 2520 Federally Mandated Operating Permits (6/21/01)  
Rule 4001 New Source Performance Standards (4/14/99)  
Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)  
Rule 4101 Visible Emissions (2/17/05)  
Rule 4102 Nuisance (12/17/92)  
Rule 4201 Particulate Matter Concentration (12/17/92)  
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 705 E. Whitmore Avenue, in Modesto, CA. 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 parsley separation and classifying operation consists of three pneumatic control systems. The first system is the airveying system that transports the parsley from the dryers to brush reel brush #1 then is pneumatically transferred to brush reel #2. After the brush reels the parsley is sent to the hopper. All air of this pneumatic system is passed through the MAC fabric dust collector. From the hopper the parsley is transferred to the second system.

The second system is the pneumatic separation system with six Accrodent rotary separators. The separators and conveyor transfer points have dust collection hoods. The dust collection hoods vent to a Torit cyclone. The parsley is then transferred to the third separation system.

The third system is a gravity separation system. The system consists of six Olivers gravity. The gravity tables and conveyors serving the gravity tables have dust collection hoods. The air from the hoods is vented through a 60" cyclone dust collector. The parsley is ready to go the packaging line.

## V. Equipment Listing

### Pre-Project Equipment Description:

N-1787-12-1: DRY PARSLEY PROCESSING OPERATION CONSISTING OF: AN AIR CONVEYING SYSTEM FROM THE DEHYDRATORS N-1787-8 AND N-1787-9 TO LINE #3 HOPPER, THE BRUSH REEL, AND THE PARSLEY HOPPER; THE PARSLEY STEM/LEAF SEPARATOR SYSTEM; AND THE GRAVITY SEPARATION SYSTEM

Proposed Modification:

N-1787-12-4: MODIFICATION OF DRY PARSLEY PROCESSING OPERATION CONSISTING OF: AN AIR CONVEYING SYSTEM FROM THE DEHYDRATORS N-1787-8 AND N-1787-9 TO LINE #3 HOPPER, THE BRUSH REEL, AND THE PARSLEY HOPPER; THE PARSLEY STEM/LEAF SEPARATOR SYSTEM; AND THE GRAVITY SEPARATION SYSTEM: ADD BRUSH REEL TO AIR CONVEYING SYSTEM; ADD ONE ACCRODENT ROTARY SEPARATOR WITH DUST COLLECTION HOOD AND CORRESPONDING CONVEYORS; DISCONNECT PARSLEY STEM/LEAF SEPARATOR SYSTEM FROM 60' CYCLONE VENTED TO NEW TORIT 36-20 CYCLONE; ADD ONE OLIVER GRAVITY SEPARATOR WITH DUST COLLECTION HOOD AND CORRESPONDING CONVEYORS VENTED TO EXISTING 60" CYCLONE

<b>Dry Parsley Processing Operation Equipment</b>	
<b>Equipment Description</b>	<b>HP Rating</b>
Existing Equipment	64.5
Brush Reel	7.5
Accrodent Rotary Separator and associated equipment	1
Torit 36-20 Cyclone	30
Oliver Gravity Separator	5
<b>Total HP</b>	<b>108</b>

Post Project Equipment Description:

N-1787-12-4: DRY PARSLEY PROCESSING OPERATION CONSISTING OF: PNEUMATIC CONVEYING SYSTEM; THE PARSLEY STEM/LEAF SEPARATOR SYSTEM; AND THE GRAVITY SEPARATION SYSTEM

**VI. Emission Control Technology Evaluation**

PM<sub>10</sub> is the only pollutant emitted from the dry parsley processing operation. The facility will be removing PM<sub>10</sub> entrained in the airstream with either a baghouse, or one of 2 cyclones. The existing 60" cyclone serving the gravity separation system, and Mac dust collector serving the pneumatic conveying system have been previously evaluated in past projects. Therefore, these units will not be re-evaluated. Per manufacturer the new high efficiency Torit 36-20 cyclone serving the parsley steam/leaf separator is expected to remove at least 99% of the PM<sub>10</sub> particles entrained in the airstream.

**VII. General Calculations**

**A. Assumptions**

- Operating schedule is 24 hr/day, 365 day/yr. (Worse Case Assumption)
- Material throughput is 42 tons/day. (Current PTO)
- PM<sub>10</sub> is the only pollutant of concern.
- Flow rate for the MAC dust collector is 600 scfm. (Per Project N-1011353)
- Flow rate for the Torit cyclone is 5,000 scfm. (Per applicant)
- Flow rate for the 60" cyclone is 20,095 scfm. (Per Project N-1011353)

## B. Emission Factors

Emissions factors for this operation were taken from the current PTO as follows.

Process	Emission Factor (lb-PM <sub>10</sub> /ton of material)
Pneumatic conveying system served by Mac dust collector	0.179
Parsley stem/leaf separator served by a Torit cyclone	0.003
Gravity separation system served by a 60" cyclone	0.024

## C. Calculations

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

The potential to emit for the operation is calculated as follows, and summarized in the table below:

$$\begin{aligned}
 PE_1 &= \text{Emission Factor} \times \text{Throughput} \\
 &= (0.179 \text{ lb-PM}_{10}/\text{ton} \times 42 \text{ tons/day}) + (0.003 \text{ lb-PM}_{10}/\text{ton} \times 42 \text{ tons/day}) + \\
 &\quad (0.024 \text{ lb-PM}_{10}/\text{ton} \times 42 \text{ tons/day}) \\
 &= 7.5 \text{ lb-PM}_{10}/\text{day} + 0.1 \text{ lb-PM}_{10}/\text{day} + 1.0 \text{ lb-PM}_{10}/\text{day} \\
 &= \mathbf{8.6 \text{ lb-PM}_{10}/\text{day}}
 \end{aligned}$$

$$\begin{aligned}
 PE_1 &= \text{Daily } PE_1 \times 365 \text{ day/year} \\
 &= 8.6 \text{ lb-PM}_{10}/\text{day} \times 365 \text{ days/year} \\
 &= \mathbf{3,139 \text{ lb-PM}_{10}/\text{year}}
 \end{aligned}$$

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

The potential to emit for the operation is calculated as follows, and summarized in the table below:

$$\begin{aligned}
 PE_2 &= \text{Emission Factor} \times \text{Throughput} \\
 &= (0.179 \text{ lb-PM}_{10}/\text{ton} \times 42 \text{ tons/day}) + (0.003 \text{ lb-PM}_{10}/\text{ton} \times 42 \text{ tons/day}) + \\
 &\quad (0.024 \text{ lb-PM}_{10}/\text{ton} \times 42 \text{ tons/day}) \\
 &= 7.5 \text{ lb-PM}_{10}/\text{day} + 0.1 \text{ lb-PM}_{10}/\text{day} + 1.0 \text{ lb-PM}_{10}/\text{day} \\
 &= \mathbf{8.6 \text{ lb-PM}_{10}/\text{day}}
 \end{aligned}$$

$$\begin{aligned}
 PE_2 &= \text{Daily } PE_1 \times 365 \text{ day/year} \\
 &= 8.6 \text{ lb-PM}_{10}/\text{day} \times 365 \text{ days/year} \\
 &= \mathbf{3,139 \text{ lb-PM}_{10}/\text{year}}
 \end{aligned}$$

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

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The total Pre-Project Stationary Source Potential to Emit (SSPE<sub>1total</sub>) can be calculated by adding the Pre-Project Potential to Emit (PE1) from all units with valid ATCs or PTOs (SSPE<sub>1Permit Unit</sub>) and the sum of the ERCs that have been banked at the source and which have not been used on-site (Total<sub>ERC</sub>).

$$SSPE1_{Total} = SSPE1_{Permit\ Unit} + Total_{ERC}$$

SSPE1 calculations were taken from previous project N-1081108.

<b>Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)</b>					
Permit Unit/ERC	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
N-1787-1-2	0	0	405	0	0
N-1787-2-1	0	0	818	0	0
N-1787-4-4	7,316	122	1,016	60,157	589
N-1787-6-2	17,345	824	3,469	57,122	7,516
N-1787-7-2	30,485	1,448	6,097	100,397	13,210
N-1787-8-3	19,447	924	3,889	64,046	8,427
N-1787-9-2	11,038	524	2,208	36,350	4,783
N-1787-10-2	34,347	146	1,095	8,578	1,789
N-1787-11-1	930	0	66	200	75
N-1787-12-2	0	0	3,139	0	0
N-1787-13-1	6,071	386	3,311	19,316	2,208
N-1787-14-1	1,116	72	216	432	180
N-1787-15-0	1,087	85	227	442	164
<b>SSPE1<sub>Permit Unit</sub></b>	<b>129,182</b>	<b>4,531</b>	<b>25,956</b>	<b>347,040</b>	<b>38,941</b>
ERC N-238-4	0	0	3,866	0	0
ERC N-239-3	0	0	0	8,376	0
ERC N-298-2 <sup>(1)</sup>	25,860	0	0	0	0
ERC N-299-2 <sup>(2)</sup>	2,726	0	0	0	0
ERC N-300-2 <sup>(3)</sup>	3,967	0	0	0	0
ERC N-484-5 <sup>(4)</sup>	0	0 (72)	0	0	0
ERC N-485-5	0	49,561	0	0	0
<b>Total<sub>ERC</sub></b>	<b>32,553</b>	<b>49,561</b>	<b>3,866</b>	<b>8,376</b>	<b>0</b>
<b>Pre-Project SSPE (SSPE<sub>1total</sub>)</b>	<b>161,735</b>	<b>54,092</b>	<b>29,822</b>	<b>355,416</b>	<b>38,941</b>

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

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source

<sup>1</sup> ERC generated onsite then transferred and withdrawn by Southern California Gas Corp. (N-4581).  
<sup>2</sup> ERC generated onsite and transferred to Southern California Gas Corp. (N-4581).  
<sup>3</sup> ERC generated onsite then transferred and withdrawn by Southern California Gas Corp. (N-4581).  
<sup>4</sup> ERC generated onsite and withdrawn for use onsite.

and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

<b>Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)</b>					
Permit Unit/ERC	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
N-1787-1-2	0	0	405	0	0
N-1787-2-1	0	0	818	0	0
N-1787-4-4	7,316	122	1,016	60,157	589
N-1787-6-2	17,345	824	3,469	57,122	7,516
N-1787-7-2	30,485	1,448	6,097	100,397	13,210
N-1787-8-3	19,447	924	3,889	64,046	8,427
N-1787-9-2	11,038	524	2,208	36,350	4,783
N-1787-10-2	34,347	146	1,095	8,578	1,789
N-1787-11-1	930	0	66	200	75
N-1787-12-4	0	0	3,139	0	0
N-1787-13-1	6,071	386	3,311	19,316	2,208
N-1787-14-1	1,116	72	216	432	180
N-1787-15-0	1,087	85	227	442	164
SSPE2 <sub>Permit Unit</sub>	129,182	4,531	25,956	347,040	38,941
ERC N-238-4	0	0	3,866	0	0
ERC N-239-3	0	0	0	8,376	0
ERC N-298-2 <sup>(1)</sup>	25,860	0	0	0	0
ERC N-299-2 <sup>(2)</sup>	2,726	0	0	0	0
ERC N-300-2 <sup>(3)</sup>	3,967	0	0	0	0
ERC N-484-5 <sup>(4)</sup>	0	0 (72)	0	0	0
ERC N-485-5	0	49,561	0	0	0
Total <sub>ERC</sub>	32,553	49,561	3,866	8,376	0
Post Project SSPE (SSPE2 <sub>total</sub> )	161,735	54,092	29,822	355,416	38,941

## 5. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site."

<sup>1</sup> ERC generated onsite then transferred and withdrawn by Southern California Gas Corp. (N-4581).

<sup>2</sup> ERC generated onsite and transferred to Southern California Gas Corp. (N-4581).

<sup>3</sup> ERC generated onsite then transferred and withdrawn by Southern California Gas Corp. (N-4581).

<sup>4</sup> ERC generated onsite and withdrawn for use onsite.

As seen in Section VII.C.3 & VII.C.4 above, this facility contains ERCs that have been banked at the source and which have not been used on-site; therefore, an adjusted Stationary Source Potential to Emit (SSPE<sub>Permit Unit</sub>) will be used to determine major source status.

<b>Major Source Determination (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
Adjusted Pre-Project SSPE (SSPE1 <sub>Permit Unit</sub> )	129,182	4,531	25,956	347,040	38,941
Adjusted Post Project SSPE (SSPE2 <sub>Permit Unit</sub> )	129,182	4,531	25,956	347,040	38,941
Major Source Threshold	50,000	140,000	140,000	200,000	50,000
Major Source?	Yes	No	No	Yes	No

As seen in the table above, the facility is an existing Major Source for NO<sub>x</sub> and CO, and is not becoming a new Major Source for the remainder of pollutants.

#### 6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22 of District Rule 2201.

As shown in Section VII.C.5 above, the facility is not a Major Source for PM<sub>10</sub>.

Therefore Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

As calculated in Section VII.C.1 above, PE1 is summarized in the following table:

<b>Baseline Emissions [BE] (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
N-1787-12-4	0	0	3,139	0	0

## 7. Major Modification

Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

As discussed in Section VII.C.5 above, the facility is not a Major Source for PM<sub>10</sub>; therefore, the project does not constitute a Major Modification.

## 8. Federal Major Modification

As shown above, this project does not constitute a Major Modification. Therefore, in accordance with District Rule 2201, Section 3.17, this project does not constitute a Federal Major Modification and no further discussion is required.

## 9. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix C.

## VIII. Compliance

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

#### A. Best Available Control Technology (BACT)

##### 1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following\*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

\*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

##### a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project; therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

**b. Relocation of emissions units – PE > 2 lb/day**

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

**c. Modification of emissions units – AIPE > 2 lb/day**

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

Where,

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

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

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

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

Where,

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

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

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

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

Pneumatic conveying system served by dust collector:

$$\begin{aligned}\text{AIPE} &= 7.5 - (7.5 * (0.179/0.179)) \\ &= 7.5 - 7.5 * 1 \\ &= 0.0 \text{ lb/day}\end{aligned}$$

Parsley leaf/stem separator served by a cyclone:

$$\begin{aligned}\text{AIPE} &= 0.1 - (0.1 * (0.003/0.003)) \\ &= 0.1 - 0.1 * 1 \\ &= 0.0 \text{ lb/day}\end{aligned}$$

Gravity separation system served by a cyclone:

$$\begin{aligned}\text{AIPE} &= 1.0 - (1.0 * (0.024/0.024)) \\ &= 1.0 - 1.0 * 1 \\ &= 0.0 \text{ lb/day}\end{aligned}$$

As demonstrated above, the AIPE is not greater than 2.0 lb/day for PM<sub>10</sub> emissions for any baghouse; therefore BACT is not triggered.

**d. Major Modification**

As discussed in Section VII.C.7 above, this project does not constitute a Major Modification; therefore BACT is not triggered.

**B. Offsets**

**1. Offset Applicability**

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

<b>Offset Determination (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
Post Project SSPE (SSPE2)	161,735	54,092	29,822	355,416	38,941
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	Yes	Yes	Yes

**2. Quantity of Offsets Required**

As seen above, the SSPE2 is greater than the offset thresholds for NO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. Since project only effects PM<sub>10</sub>, offset calculations will be required to determine PM<sub>10</sub> offsets are required for this project.

Per Sections 4.7.2 and 4.7.3, the quantity of offsets in pounds per year for PM<sub>10</sub> is calculated as follows for sources with an SSPE1 less than the offset threshold levels before implementing the project being evaluated.

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

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

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or

- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE)

The facility is not a major source for PM<sub>10</sub> therefore the Baseline Emissions are equal to PE<sub>1</sub>. Also, there is only one emissions unit associated with this project and there are no increases in cargo carrier emissions; therefore offsets can be determined as follows:

Offsets Required (lb/year) = ([PE<sub>2</sub> – BE] + ICCE) x DOR

PE<sub>2</sub> (PM<sub>10</sub>) = 3,139 lb/year

BE (PM<sub>10</sub>) = PE<sub>1</sub> = 3,139 lb/year

ICCE = 0 lb/year

Offsets Required (lb/year) = ([3,139 – 3,139] + 0) x DOR  
= 0 x DOR  
= 0 lb PM<sub>10</sub>/year

Therefore, this project does not require any offsets.

## C. Public Notification

### 1. Applicability

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

#### a. New Major Source

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

#### b. Major Modification

As demonstrated in VII.C.7, this project does not constitute a Major Modification; therefore, public noticing for Major Modification purposes is not required.

**c. PE > 100 lb/day**

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project; therefore public noticing is not required for this project for Potential to Emit Purposes.

**d. Offset Threshold**

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

<b>Offset Threshold</b>				
<b>Pollutant</b>	<b>SSPE1 (lb/year)</b>	<b>SSPE2 (lb/year)</b>	<b>Offset Threshold</b>	<b>Public Notice Required?</b>
NO <sub>x</sub>	161,735	161,735	20,000 lb/year	No
SO <sub>x</sub>	54,092	54,092	54,750 lb/year	No
PM <sub>10</sub>	29,822	29,822	29,200 lb/year	No
CO	355,416	355,416	200,000 lb/year	No
VOC	38,941	38,941	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

**e. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e.  $SSIPE = SSPE2 - SSPE1$ . The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

<b>Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice</b>					
<b>Pollutant</b>	<b>SSPE2 (lb/year)</b>	<b>SSPE1 (lb/year)</b>	<b>SSIPE (lb/year)</b>	<b>SSIPE Public Notice Threshold</b>	<b>Public Notice Required?</b>
NO <sub>x</sub>	161,735	161,735	0	20,000 lb/year	No
SO <sub>x</sub>	54,092	54,092	0	20,000 lb/year	No
PM <sub>10</sub>	29,822	29,822	0	20,000 lb/year	No
CO	355,416	355,416	0	20,000 lb/year	No
VOC	38,941	38,941	0	20,000 lb/year	No

As demonstrated above, the SSIPs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIP purposes is not required.

## **2. Public Notice Action**

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

## **D. Daily Emission Limits (DELs)**

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

### **Proposed Rule 2201 (DEL) Conditions:**

- The pneumatic conveying system consists of 2 brush reels, an aspirator, parsley hopper and associated pneumatic conveying equipment. This system is vented to a MAC model 36FRB7 dust collector. [District NSR Rule]
- The parsley stem/leaf separator system consists of 6 Accordant rotary separators and 8 conveyor transfer points with dust collection hoods vented to a Torit 32-60 cyclone. [District NSR Rule]
- The gravity separation system consists of six Oliver destoners each with a dust collection hood, 2 feed shakers, associated conveyor transfer pickup hoods vented to a 60" high efficiency cyclone. [District NSR Rule]
- The quantity of material processed shall not exceed 60 tons during any one day. [District NSR Rule]
- The PM10 emissions shall not exceed 0.179 pounds per ton of material processed from the pneumatic conveying system served by the MAC dust collector. [District NSR Rule]
- The PM10 emissions shall not exceed 0.003 pounds per ton of material processed from the parsley stem/leaf separation system served by Torit cyclone. [District NSR Rule]
- The PM10 emissions shall not exceed 0.024 pounds per ton of material processed from the gravity table and dust hoods system served by the 60" high efficiency cyclone. [District NSR Rule]

## **E. Compliance Assurance**

### **1. Source Testing**

District Policy 1705 (10/9/97) section II step 4 requires initial source testing for non-combustion equipment served by a baghouse with expected PM10 emissions of 30 pounds per day or greater. Pursuant to section VII.C.1 of this document, the PM10 emissions from this permit unit will not exceed 30 pounds per day; therefore, initial source testing will not be required.

### **2. Monitoring**

No monitoring is required to demonstrate compliance with Rule 2201.

### **3. Recordkeeping**

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

- A daily log shall be maintained on the premises indicating the amount of material processed. [District NSR Rule]

### **4. Reporting**

No reporting is required to demonstrate compliance with Rule 2201.

## **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 pursuant to Section 3.20 of this rule:

In accordance with Rule 2520, 3.20, these modifications:

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.

As discussed above, the facility has applied for a Certificate of Conformity (COC); 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.

#### **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 dry parsley processing operation.

#### **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 dry parsley processing operations.

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

As long as the equipment is properly maintained and operated, the emission units shall not discharge, into the atmosphere, any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark, or darker, in shade as that designated as No. 1 on the Ringelmann Chart or equivalent to 20% opacity.

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

Per District Policy SSP 1005, the visible emissions from processes served by a baghouse or fabric filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. If the equipment is properly maintained this condition should not be exceeded. The following condition will be placed on the permit:

- Visible emissions from the exhaust of the Mac dust collector serving the pneumatic conveying system shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]

### **Rule 4102 Nuisance**

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

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

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

As demonstrated above, there are no increases in emissions associated with this project. Furthermore, the particulate matter emitted from the operation is parsley chaff that is not a HAP. 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.

#### Mac Dust Collector:

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM emission rate}) \times (7,000 \text{ gr/lb})}{(\text{Air flow rate}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM<sub>10</sub> emission rate = 7.5 lb/day. Assuming 100% of PM is PM<sub>10</sub>  
Exhaust Gas Flow = 600 scfm

$$\text{PM Conc. (gr/scf)} = [(7.5 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(600 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})]$$

PM Conc. = 0.06 gr/scf

#### Torit Cyclone:

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM emission rate}) \times (7,000 \text{ gr/lb})}{(\text{Air flow rate}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM<sub>10</sub> emission rate = 0.1 lb/day. Assuming 100% of PM is PM<sub>10</sub>  
Exhaust Gas Flow = 5,000 scfm

$$\text{PM Conc. (gr/scf)} = [(0.1 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(5,000 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})]$$

PM Conc. = 0.0001 gr/scf

60" Cyclone:

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM emission rate}) \times (7,000 \text{ gr/lb})}{(\text{Air flow rate}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM<sub>10</sub> emission rate = 1.0 lb/day. Assuming 100% of PM is PM<sub>10</sub>  
Exhaust Gas Flow = 20,000 scfm

$$\text{PM Conc. (gr/scf)} = [(1.0 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(20,000 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})]$$

PM Conc. = 0.0002 gr/scf

**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)**

The California Environmental Quality Act (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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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**

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

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant 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 activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (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)).

**IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Pending a successful EPA Noticing period, issue Authority to Construct N-1787-12-4 subject to the permit conditions on the attached draft Authority to Construct in Appendix B.

**X. Billing Information**

<b>Annual Permit Fees</b>			
Permit Number	Fee Schedule	Fee Description	Annual Fee
N-1787-12-4	3020-01-D	108 hp	\$384.00

**Appendices**

- A: Current PTO
- B: Draft ATC
- C: Quarterly Net Emissions Change

**APPENDIX A**  
**Current PTO**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1787-12-2

**EXPIRATION DATE:** 07/31/2009

**EQUIPMENT DESCRIPTION:**

DRY PARSLEY PROCESSING OPERATION CONSISTING OF: AN AIR CONVEYING SYSTEM FROM THE DEHYDRATORS N-1787-8 AND N-1787-9 TO LINE #3 HOPPER, THE BRUSH REEL, AND THE PARSLEY HOPPER; THE PARSLEY STEM/LEAF SEPARATOR SYSTEM; AND THE GRAVITY SEPARATION SYSTEM

## 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. The air conveying system consists of receiver #1 served by the brush reel, receiver #2 served by the line #3 hopper, and the pickup points from the two dehydrators, and a parsley hopper. This system is vented to a MAC model 36FRB7 dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The parsley stem/leaf separator system is vented to a KICE model CK-60 cyclone dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The gravity separation system consists of five Oliver gravity tables each with a dust collection hood and seven conveyor transfer pickup hoods for the various conveyors all vented to a 60" high efficiency cyclone dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The MAC dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Federally Enforceable Through Title V Permit
6. A spare bag shall be kept at the premises for the MAC dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Visible emissions from the MAC dust collector shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The quantity of material processed shall not exceed 42 tons during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The PM10 emissions shall not exceed 0.179 pounds per ton of material processed from the pneumatic conveying system served by the MAC dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The PM10 emissions shall not exceed 0.003 pounds per ton of material processed from the parsley stem/leaf separation system served by the Kice cyclone. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The PM10 emissions shall not exceed 0.024 pounds per ton of material processed from the gravity table and dust hoods system served by the 60" high efficiency cyclone. [District NSR Rule] Federally Enforceable Through Title V Permit

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

14. A daily log shall be maintained on the premises indicating the amount of material processed. [District NSR Rule] Federally Enforceable Through Title V Permit
15. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. The MAC dust collector's pressure drop shall be observed and recorded monthly during operation of this unit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 (amended 12/17/1992) using the equation  $E=3.59 \times P^{0.62}$  if P is less than or equal to 30 tons per hour, or  $E=17.31 \times P^{0.16}$  if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit

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

**APPENDIX B**  
**Draft ATC**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**  
**DRAFT**

**PERMIT NO:** N-1787-12-4

**LEGAL OWNER OR OPERATOR:** GILROY FOODS  
**MAILING ADDRESS:** 705 E WHITMORE AVE  
MODESTO, CA 95358-9408

**LOCATION:** 705 E. WHITMORE AVE  
MODESTO, CA 95358-9408

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF DRY PARSLEY PROCESSING OPERATION CONSISTING OF: AN AIR CONVEYING SYSTEM FROM THE DEHYDRATORS N-1787-8 AND N-1787-9 TO LINE #3 HOPPER, THE BRUSH REEL, AND THE PARSLEY HOPPER; THE PARSLEY STEM/LEAF SEPARATOR SYSTEM; AND THE GRAVITY SEPARATION SYSTEM: ADD BRUSH REEL TO AIR CONVEYING SYSTEM; ADD ONE ACCRODENT ROTARY SEPARATOR WITH DUST COLLECTION HOOD AND CORRESPONDING CONVEYORS; DISCONNECT PARSLEY STEM/LEAF SEPARATOR SYSTEM FROM 60' CYCLONE VENTED TO NEW TORIT 36-20 CYCLONE; ADD ONE OLIVER GRAVITY SEPARATOR WITH DUST COLLECTION HOOD AND CORRESPONDING CONVEYORS VENTED TO EXISTING 60" CYCLONE

**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 NSR Rule] 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. The pneumatic conveying system consists of 2 brush reels, an aspirator, parsley hopper and associated pneumatic conveying equipment. This system is vented to a MAC model 36FRB7 dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The parsley stem/leaf separator system consists of 6 Accordant rotary separators and 8 conveyor transfer points with dust collection hoods vented to a Torit 32-60 cyclone. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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

**DAVID WARNER, Director of Permit Services**  
N-1787-12-4 : May 17 2010 3:31PM - GONZALEV : Joint Inspection NOT Required

5. The gravity separation system consists of six Oliver destoners each with a dust collection hood, 2 feed shakers, associated conveyor transfer pickup hoods vented to a 60" high efficiency cyclone. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The MAC dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Federally Enforceable Through Title V Permit
7. A spare bag shall be kept at the premises for the MAC dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
11. 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
12. Visible emissions from the exhaust of the Mac dust collector serving the pneumatic conveying system shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 4101] Federally Enforceable Through Title V Permit
13. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
14. The quantity of material processed shall not exceed 42 tons during any one day, [District NSR Rule] Federally Enforceable Through Title V Permit
15. The PM10 emissions shall not exceed 0.179 pounds per ton of material processed from the pneumatic conveying system served by the MAC dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The PM10 emissions shall not exceed 0.003 pounds per ton of material processed from the parsley stem/leaf separation system served by Torit cyclone. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The PM10 emissions shall not exceed 0.024 pounds per ton of material processed from the gravity table and dust hoods system served by the 42" high efficiency cyclone. [District NSR Rule] Federally Enforceable Through Title V Permit
18. A daily log shall be maintained on the premises indicating the amount of material processed. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. The MAC dust collector's pressure drop shall be observed and recorded monthly during operation of this unit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

24. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 (amended 12/17/1992) using the equation  $E=3.59 \times P^{0.62}$  if P is less than or equal to 30 tons per hour, or  $E=17.31 \times P^{0.16}$  if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit

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**APPENDIX C**  
**Quarterly Net Emissions Change (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.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

$$\begin{aligned} \text{PE2}_{\text{quarterly}} &= \text{PE2}_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 3,139 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 785 \text{ lb PM}_{10}/\text{qtr} \end{aligned}$$

$$\begin{aligned} \text{PE1}_{\text{quarterly}} &= \text{PE1}_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 3,139 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 785 \text{ lb PM}_{10}/\text{qtr} \end{aligned}$$

Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	785	785	0
CO	0	0	0
VOC	0	0	0