



DEC 10 2015

Mr. Robert Hilarides  
Hilarides Dairy  
24163 Road 188  
Lindsay, CA

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # S-5058**  
**Project # S-1154081**

Dear Mr. Hilarides:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit(s) to Operate (PTOs) S-5058-17 of the facility's current Title V operating permit. The modification consisted of adding test method ASTM D-1945-96 as a District approved VOC test method for the biogas processing operation.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO(s) S-5058-17-2, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

  
Arnaud Marjollet  
Director of Permit Services

Enclosures

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

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  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# TITLE V APPLICATION REVIEW

Minor Modification

Project #: S5058, 1154081

Engineer: Steve Davidson

Date: November 25, 2015

Facility Number: S-5058  
Facility Name: Hilarides Dairy  
Mailing Address: 24163 Road 188  
Lindsay, CA 93247

RWK 12/7/15

Contact Name: Robert J. Hilarides  
Phone: (559) 562-0125

Responsible Official: Robert J. Hilarides  
Title: Owner

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## I. PROPOSAL

Hilarides Dairy is proposing a Title V minor permit modification to add test method ASTM D-1945-96 as a District approved VOC test method for the biogas processing operation listed on permit S-5058-17.

## II. FACILITY LOCATION

The equipment is operated at 24163 Road 188 in Lindsay, CA.

## III. EQUIPMENT DESCRIPTION

### Pre-Project:

S-5058-17-1: GAS PROCESSING OPERATION CONSISTING OF COMPRESSORS, SULFATREAT H2S SCRUBBING VESSELS (OR EQUIVALENT H2S SCRUBBER), AND A QUESTAIR M-3200 PRESSURE SWING ADSORPTION (PSA) GAS PURIFICATION SYSTEM

### Proposed Modification:

S-5058-17-2: MODIFICATION OF GAS PROCESSING OPERATION CONSISTING OF COMPRESSORS, SULFATREAT H2S SCRUBBING VESSELS (OR EQUIVALENT H2S SCRUBBER), AND A QUESTAIR M-3200 PRESSURE SWING ADSORPTION (PSA) GAS PURIFICATION

SYSTEM: ADD TEST METHOD ASTM D-1945-96 AS A DISTRICT  
APPROVED VOC TEST METHOD

Post Project:

S-5058-17-2: GAS PROCESSING OPERATION CONSISTING OF COMPRESSORS,  
SULFATREAT H<sub>2</sub>S SCRUBBING VESSELS AND A QUESTAIR M-  
3200 PRESSURE SWING ADSORPTION (PSA) GAS PURIFICATION  
SYSTEM

#### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the Title V permit is considered to be a minor modification and, as such, requires no public review.

#### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Hilarides Dairy is proposing add test method ASTM D-1945-96 as a District approved VOC test method for the biogas processing operation.

Currently, the permit lists SCAQMD Method 25.3 as approved to determine the total non-methane VOCs in the biogas.

Test method ASTM D-1945-96 is a District approved method to determine total hydrocarbon and methane content of a gas. Therefore, condition 4 of Permit S-5058-17 will be modified as follows:

- Total VOC testing of the biogas shall be performed utilizing test method ASTM D-1945-96, SCAQMD Method 25.3 or other method(s) approved by the District. [District Rule 2201] Y

#### VII. COMPLIANCE

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.

Because these permit revisions meet all the above criteria, this is a Minor Modification.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit
- B. Emissions Increases
- C. Application
- D. Previous Title V Operating Permit

# ATTACHMENT A

Proposed Modified Title V Operating Permit #  
S-5058-17-2

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-5058-17-2

EXPIRATION DATE: 12/31/2018

## EQUIPMENT DESCRIPTION:

GAS PROCESSING OPERATION CONSISTING OF COMPRESSORS, SULFATREAT H<sub>2</sub>S SCRUBBING VESSELS (OR EQUIVALENT H<sub>2</sub>S SCRUBBER), AND A QUESTAIR M-3200 PRESSURE SWING ADSORPTION (PSA) GAS PURIFICATION SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The gas processing operation shall only process biogas with a VOC content not exceeding 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Source testing to determine the total VOC content of the biogas shall be performed with the digesters operating at conditions representative of steady state operations. Annual source testing of the VOC content of the biogas shall be conducted at least once every twelve (12) months. Annual source testing may discontinue if three consecutive annual source tests demonstrate that the biogas processed has a VOC content of 5% or less. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Total VOC testing of the biogas shall be performed utilizing test method ASTM D-1945-96, SCAQMD Method 25.3 or other method(s) approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All piping, valves, fittings, threaded connections, pumps, and compressors for the gas processing operation shall be constructed and maintained in a leak-free condition. A leak-free condition is a condition without a gas leak and without a leak of organic liquid at a rate of more than 3 drops per minute. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component into a container is not considered a leak provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking and shall be repaired expeditiously. If the leak cannot be eliminated immediately, then the leak shall be minimized to the lowest possible level by using best maintenance practices. Operator shall maintain records of the date/time the leak was discovered and date/time the component was repaired to a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Exhaust gas from the PSA unit shall be returned to the digester, directed to the biogas-fired engines (Permit #S-5058-5, -6, -7, -8, -9, & -10) for combustion, or directed to a VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by US EPA Method 25 or 25a. Exhaust gas from the PSA may be combusted in the emergency flare (Permit #S-5058-11) during emergency situations. [District Rule 2201] Federally Enforceable Through Title V Permit

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

9. Sampling ports adequate for extraction of grab samples, use of a District-approved portable emission monitor, and use of a District-approved H<sub>2</sub>S detection device shall be provided. Sampling ports may be located in the inlet biogas pipeline to the gas processing operation. [District Rule 1081] Federally Enforceable Through Title V Permit
10. 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 30 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Permittee shall maintain weekly and annual records of amount of biogas processed in MMscf. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Emissions Increase

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-5058-17	0	0	0	0	0
Total	0	0	0	0	0

# ATTACHMENT C

Application



# San Joaquin Valley Air Pollution Control District

www.valleyair.org

NOV 06 2015

SJVAPCD  
Southern Region



## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>Hilarides Dairy</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>24163 Road 188</u> CITY: <u>Lindsay</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93247</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>24163 Road 188</u> CITY: <u>Lindsay</u> <u>1/4 SECTION = SE 33</u> TOWNSHIP = <u>19S</u> RANGE = <u>26E</u>	INSTALLATION DATE: <u>N/A</u>
4. GENERAL NATURE OF BUSINESS: <u>Dairy farm</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>Incorporate approved alternative test method ASTM D-1945-96 to Permit S-5058-17-1, Condition #4.</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Robert J. Hilarides</u>	TITLE OF APPLICANT: <u>owner</u>
7. SIGNATURE OF APPLICANT: <u>Robert J. Hilarides</u>	DATE: <u>11-3-15</u> PHONE: <u>(559) 562-0135</u> FAX: <u>(559) 562-0880</u> EMAIL: <u>rjh@hilaridesdairy.com</u>

For APCD Use Only:

HILARIDES DAIRY

DATE STAMP	FILING FEE RECEIVED: \$ <u>20</u> CHECK#: <u>2398</u>
	DATE PAID: <u>PM 11/4</u>
	PROJECT NO: <u>S-1154081</u> FACILITY ID: <u>S-5058</u>



**San Joaquin Valley  
Unified Air Pollution Control District**

RECEIVED  
NOV 06 2015  
SJVAPCD  
Southern Region



**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

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

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: <u>Hilarides Dairy</u>	FACILITY ID: <u>S-5058</u>
1. Type of Organization: <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>Robert Hilarides</u>	
3. Agent to the Owner:	

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

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

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

Robert J. Hilarides  
Signature of Responsible Official

11-3-15  
Date

Robert J. Hilarides  
Name of Responsible Official (please print)

owner  
Title of Responsible Official (please print)



Marisa Simoes &lt;marisarsimoes@gmail.com&gt;

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## Air District - Test Method Submittal Form

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Renee Chavez &lt;Renee.Chavez@valleyair.org&gt;

Tue, Oct 20, 2015 at 3:44 PM

To: Marisa Simoes &lt;marisarsimoes@gmail.com&gt;

Cc: "Rob Hilarides (rjh@hilaridesdairy.com)" &lt;rjh@hilaridesdairy.com&gt;, Stephen Amberg &lt;Stephen.Amberg@valleyair.org&gt;, Mike Oldershaw &lt;Mike.Oldershaw@valleyair.org&gt;

Hi Marisa,

I spoke to my manager, Mike Oldershaw, who confirmed that the proposed alternative test method (ASTM D-1945-96) may be used in place of test method SCAQMD 25.3. However, in order to make this all official I'll need the attached permit applications completed and submitted (along with application fees) so that this allowance is clearly stated on permit -17-1. I've also included with this email a copy of Notice to Comply (NTC) 5008072 which establishes a due date for these application as Wednesday, November 4<sup>th</sup>. Because Hilarides Dairy completed all required testing and demonstrated compliance prior to the facility becoming a Title V facility, a deviation report is not required. Please keep in mind that failing to meet the established due date will result in a violation. If you need assistance in completing the applications you can call myself or the District's Small Business Assistance at (661) 392-5665.

On a side, you'll want to print a copy of the attached NTC for your records as hardcopy will not be mailed.

Thank you,

Renee Chavez

**From:** Marisa Simoes [mailto:marisarsimoes@gmail.com]

**Sent:** Tuesday, September 22, 2015 11:03 AM

**To:** Renee Chavez

**Cc:** Rob Hilarides (rjh@hilaridesdairy.com); Stephen Amberg

**Subject:** Re: Air District - Test Method Submittal Form

Renee

Attached is the test method submittal form from Rob. Have a great day :)

Marisa

# ATTACHMENT D

Previous Title V Operating Permit  
S-5058-17-1

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-5058-17-1

**EXPIRATION DATE:** 12/31/2018

**EQUIPMENT DESCRIPTION:**

GAS PROCESSING OPERATION CONSISTING OF COMPRESSORS, SULFATREAT H<sub>2</sub>S SCRUBBING VESSELS (OR EQUIVALENT H<sub>2</sub>S SCRUBBER), AND A QUESTAIR M-3200 PRESSURE SWING ADSORPTION (PSA) GAS PURIFICATION SYSTEM

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