



OCT 13 2015

Mr. Polo Duarte
Pacific Ethanol Madera LLC
400 Capital Mall, Suite 2060
Sacramento, Ca 95814

**Re: Notice of Minor Title V Permit Modification
District Facility # C-4261
Project # 1152444**

Dear Mr. Duarte:

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 incorporate recently issued C-4261-37-7 (under project C-1152247) into the Title V operating permit. ATC C-4261-37-7 authorized the replacement of the existing yeast propagation tank with a new 40,000 gallon tank.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-4261-37-7, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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,

Arnaud Marjollet

Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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
www.valleyair.org www.healthyairliving.com

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1152444

Engineer: Jesse A. Garcia
Date: October 9, 2015

Facility Number: C-4261
Facility Name: Pacific Ethanol Madera LLC
Mailing Address: 400 Capital Mall, Suite 2060
Sacramento, CA 95814

Contact Name: Polo Duarte
Phone: (559) 662-0553

Responsible Official: Mike Kandris
Title: Chief Operations Officer

I. PROPOSAL

Pacific Ethanol Madera LLC is proposing a Title V minor permit modification to incorporate recently issued C-4261-37-7 (under project C-1152247) into the Title V operating permit. ATC C-4261-37-7 authorized the replacement of the existing yeast propagation tank with a new 40,000 gallon tank.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

31470 Avenue 12 in Madera, CA.

III. EQUIPMENT DESCRIPTION

ATC C-4261-37-7: MODIFICATION OF 103,500 GALLON YEAST PROPAGATION TANK SERVED BY AN APACHE STAINLESS "FERMENTATION" (AKA "CO2") WET SCRUBBER WHICH VENTS TO A 2.5 MMBTU/HR REGENERATIVE THERMAL OXIDIZER (RTO) (SCRUBBER AND RTO SHARED WITH PERMITS C-4261-39 AND '-40. RTO ALSO SHARED

WITH C-4261-49): REPLACE YEAST PROPAGATION TANK WITH A NEW 40,000 GALLON CAPACITY TANK

Proposed PTO C-4261-37-8: 40,000 GALLON YEAST PROPAGATION TANK SERVED BY AN APACHE STAINLESS "FERMENTATION" (AKA "CO₂") WET SCRUBBER WHICH VENTS TO A 2.5 MMBTU/HR REGENERATIVE THERMAL OXIDIZER (RTO) (SCRUBBER AND RTO SHARED WITH PERMITS C-4261-39 AND '40. RTO ALSO SHARED WITH C-4261-49)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a 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

The equipment description was amended to include the new size of the propagation tank.

Condition #1 of the ATC was removed from the proposed permit as this application satisfies the requirement; all other conditions remain the same.

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.

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 No. C-4261-37-8
- B. Authority to Construct No. C-4261-37-7
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No. C-4261-37-6

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(C-4261-37-8)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-4261-37-8

EXPIRATION DATE: 11/30/2017

EQUIPMENT DESCRIPTION:

43,000 GALLON YEAST PROPAGATION TANK SERVED BY AN APACHE STAINLESS "FERMENTATION" (AKA "CO2") WET SCRUBBER WHICH VENTS TO A 2.5 MMBTU/HR REGENERATIVE THERMAL OXIDIZER (RTO) (SCRUBBER AND RTO SHARED WITH PERMITS C-4261-39 AND '40. RTO ALSO SHARED WITH C-4261-49)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 125,000 gallon/day or 40,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All vapors from the yeast propagation tank shall be vented through the "fermentation" (aka "CO2") scrubber and then through the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The overall control efficiency achieved by the "fermentation" (aka "CO2") scrubber and RTO combined shall be a minimum of 99.5% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Controlled VOC emissions rate from the yeast propagation tank served by the "fermentation" (aka "CO2") scrubber vented to the RTO shall not exceed 0.08365 lb-VOC/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Controlled VOC emissions rate from the exhaust of the RTO while serving the yeast propagation tank, fermentation process tanks, beerwell process tank and denatured ethanol loading rack shall not exceed 0.171 lb/1,000 gal-processed. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Fugitive VOC emissions from equipment leaks associated with this yeast propagation tank shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Fugitive VOC emissions shall be calculated using the EPA "1995 Protocol for equipment Leak Emissions Estimates" (EPA-453/R-95-017), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
12. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] 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.

13. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. Upon recommencing operation, source testing to determine the VOC emission rate (expressed as lb-VOC/1,000 gal-ethanol produced) from the outlet of the RTO shall be conducted at least once every twelve (12) months. Source testing shall be conducted under conditions representative of normal operations and while no denatured ethanol is being processed through the loading rack permitted under C-4261-49. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Upon recommencing operation, source testing to demonstrate compliance with the 99.5% overall VOC control efficiency of the "fermentation" (aka "CO2") scrubber vented to the RTO shall be conducted at least once every twelve (12) months. Source testing shall be conducted under conditions representative of normal operations and while no denatured ethanol is being processed through the loading rack permitted under C-4261-49. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing to determine the rate of VOC, measured in ppmv and converted to lb-VOC/gal-ethanol produced, shall be conducted using EPA Method 25 or 25A in conjunction with the results of EPA Method 18 conducted previously on the exhaust of the scrubber serving the fermentation process at Pacific Ethanol Madera or Pacific Ethanol Stockton. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
19. During source testing, permittee shall maintain records of the amount of ethanol produced, in gal-ethanol/hour. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The "fermentation" (aka "CO2") scrubber shall be equipped with a water flow meter, in operation at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The water flow rate through the "fermentation" (aka "CO2") scrubber shall not be less than 30 gal/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Upon recommencing operation, the permittee shall monitor and record the water flow rate through the "fermentation" (aka "CO2") scrubber at least once every day. [District Rule 2201] Federally Enforceable Through Title V Permit
24. If the water flow rate through the "fermentation" (aka "CO2") scrubber is less than 30 gal/minute, the permittee shall correct the water flow rate to exceed 30 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate through the "fermentation" (aka "CO2") scrubber continues to be less than 30 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Upon recommencing operation, the permittee shall maintain daily records of (1) the date of water flow rate measurements, (2) the water flow rate through the "fermentation" (aka "CO2") scrubber at the time of measure, and (3) a description of any corrective action taken to maintain the water flow rate above the 30 gal/minute limit. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Valves, threaded connections, and flanges shall not leak VOCs in excess of 100 ppmv above background when measured in accordance with EPA Method 21, provided the total number of leaking tagged components of any component type does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] 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.

27. Pressure relief valves (PRVs) shall not leak VOC's in excess of 100 ppmv above background when measured in the plane at the centroid of any atmospheric vent with an instrument calibrated with methane, provided the total number of leaking PRVs does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
28. Process drains shall not leak VOC's in excess of 100 ppmv above background when measured at a distance of one (1) centimeter of the potential source with an instrument calibrated with methane, provided the total number of leaking process drains does not exceed 0.5 percent of the total number of components inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
29. Pumps or compressors which handle a VOC or any associated seal fluid system which circulates a fluid through or between seals on process pumps or compressors shall not leak in excess of 500 ppmv above background when measured in accordance with EPA Method 21. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
30. Upon recommencing operation, this operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit C-4261-0. [District Rule 4455] Federally Enforceable Through Title V Permit
31. Upon recommencing operation, this operation shall comply with the requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, as specified on facility wide permit C-4261-0. [40 CFR 60.480 and 60.481] Federally Enforceable Through Title V Permit
32. All records shall be retained on site for a minimum of five (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.

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ATTACHMENT B

Authority to Construct No.
(C-4261-37-7)



AUTHORITY TO CONSTRUCT

PERMIT NO: C-4261-37-7

ISSUANCE DATE: 08/26/2015

LEGAL OWNER OR OPERATOR: PACIFIC ETHANOL MADERA LLC
MAILING ADDRESS: 400 CAPITOL MALL, SUITE 2060
SACRAMENTO, CA 95814

LOCATION: 31470 AVENUE 12
MADERA, CA 93637

EQUIPMENT DESCRIPTION:

MODIFICATION OF 103,500 GALLON YEAST PROPAGATION TANK SERVED BY AN APACHE STAINLESS "FERMENTATION" (AKA "CO2") WET SCRUBBER WHICH VENTS TO A 2.5 MMBTU/HR REGENERATIVE THERMAL OXIDIZER (RTO) (SCRUBBER AND RTO SHARED WITH PERMITS C-4261-39 AND '40. RTO ALSO SHARED WITH C-4261-49); REPLACE YEAST PROPAGATION TANK WITH A NEW 40,000 GALLON CAPACITY TANK

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. 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
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] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 125,000 gallon/day or 40,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All vapors from the yeast propagation tank shall be vented through the "fermentation" (aka "CO2") scrubber and then through the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The overall control efficiency achieved by the "fermentation" (aka "CO2") scrubber and RTO combined shall be a minimum of 99.5% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Sadfedin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

C-4261-37-7 Aug 26 2015 10:08AM - GARCIAU Joint Inspection NOT Required

8. Controlled VOC emissions rate from the yeast propagation tank served by the "fermentation" (aka "CO₂") scrubber vented to the RTO shall not exceed 0.08365 lb-VOC/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Controlled VOC emissions rate from the exhaust of the RTO while serving the yeast propagation tank, fermentation process tanks, beerwell process tank and denatured ethanol loading rack shall not exceed 0.171 lb/1,000 gal-processed. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Fugitive VOC emissions from equipment leaks associated with this yeast propagation tank shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
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13. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
14. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. Upon recommencing operation, source testing to determine the VOC emission rate (expressed as lb-VOC/1,000 gal-ethanol produced) from the outlet of the RTO shall be conducted at least once every twelve (12) months. Source testing shall be conducted under conditions representative of normal operations and while no denatured ethanol is being processed through the loading rack permitted under C-4261-49. [District Rule 2201] Federally Enforceable Through Title V Permit
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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] Federally Enforceable Through Title V Permit
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23. The water flow rate through the "fermentation" (aka "CO₂") scrubber shall not be less than 30 gal/minute. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. Upon recommencing operation, the permittee shall monitor and record the water flow rate through the "fermentation" (aka "CO₂") scrubber at least once every day. [District Rule 2201] Federally Enforceable Through Title V Permit
25. If the water flow rate through the "fermentation" (aka "CO₂") scrubber is less than 30 gal/minute, the permittee shall correct the water flow rate to exceed 30 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate through the "fermentation" (aka "CO₂") scrubber continues to be less than 30 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [District Rule 2201] Federally Enforceable Through Title V Permit
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31. Upon recommencing operation, this operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit C-4261-0. [District Rule 4455] Federally Enforceable Through Title V Permit
32. Upon recommencing operation, this operation shall comply with the requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, as specified on facility wide permit C-4261-0. [40 CFR 60.480 and 60.481] Federally Enforceable Through Title V Permit
33. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-4261-37	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org



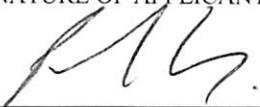
Received

AUG 26 2015

COMPLIANCE
SJVUAPCD

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center; font-size: 1.2em;">Pacific Ethanol Madera LLC</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>400 Capital Mall, Suite 2060,</u> CITY: <u>Sacramento</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95814</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>31470 Avenue 12</u> CITY: <u>Madera</u> _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <u>10-30-2014</u>
4. GENERAL NATURE OF BUSINESS: <u>Ethanol Producer</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>MODIFICATION OF 103,500 GALLON YEAST PROPAGATION TANK SERVED BY AN APACHE STAINLESS "FERMENTATION" (AKA "CO2") WET SCRUBBER WHICH VENTS TO A 2.5 MMBTU/HR REGENERATIVE THERMAL OXIDIZER (RTO) (SCRUBBER AND RTO SHARED WITH PERMITS C-4261-39 AND '40. RTO ALSO SHARED WITH C-4261-49); REPLACE YEAST PROPAGATION TANK WITH A NEW 40,000 GALLON CAPACITY TANK</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Polo Duarte</u>	TITLE OF APPLICANT: <u>EHS Manager</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>8/26/15</u> PHONE: (559) 662-0553 FAX: () EMAIL: <u>aduarte@pacificethanol.com</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ <u>Ø</u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>C-1152444</u> FACILITY ID: <u>C-4261</u>
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San Joaquin Valley Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME:	FACILITY ID: -
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Pacific Ethanol Madera LLC	
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 foregoing is correct and true:

Mike Kandris

 Signature of Responsible Official

8/25/2015

 Date

Mike Kandris

 Name of Responsible Official (please print)

- Chief Operation Officer

 Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit No.
C-4261-37-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-4261-37-6

EXPIRATION DATE: 11/30/2017

EQUIPMENT DESCRIPTION:

103,500 GALLON YEAST PROPAGATION TANK SERVED BY AN APACHE STAINLESS "FERMENTATION" (AKA "CO₂") WET SCRUBBER WHICH VENTS TO A 2.5 MMBTU/HR REGENERATIVE THERMAL OXIDIZER (RTO) (SCRUBBER AND RTO SHARED WITH PERMITS C-4261-39 AND '40. RTO ALSO SHARED WITH C-4261-49)

PERMIT UNIT REQUIREMENTS

1. A source test to demonstrate compliance with the indicated emission limits/control efficiencies shall be performed within 60 days of recommencing operation of this unit following removal of dormant status. [District Rule 2010] Federally Enforceable Through Title V Permit
2. 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
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] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 125,000 gallon/day or 40,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All vapors from the yeast propagation tank shall be vented through the "fermentation" (aka "CO₂") scrubber and then through the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The overall control efficiency achieved by the "fermentation" (aka "CO₂") scrubber and RTO combined shall be a minimum of 99.5% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Controlled VOC emissions rate from the yeast propagation tank served by the "fermentation" (aka "CO₂") scrubber vented to the RTO shall not exceed 0.08365 lb-VOC/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Controlled VOC emissions rate from the exhaust of the RTO while serving the yeast propagation tank, fermentation process tanks, beerwell process tank and denatured ethanol loading rack shall not exceed 0.171 lb/1,000 gal-processed. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Fugitive VOC emissions from equipment leaks associated with this yeast propagation tank shall not exceed 0.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fugitive VOC emissions shall be calculated using the EPA "1995 Protocol for equipment Leak Emissions Estimates" (EPA-453/R-95-017), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. [District Rule 4623] 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.

13. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
14. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. Upon recommencing operation, source testing to determine the VOC emission rate (expressed as lb-VOC/1,000 gal-ethanol produced) from the outlet of the RTO shall be conducted at least once every twelve (12) months. Source testing shall be conducted under conditions representative of normal operations and while no denatured ethanol is being processed through the loading rack permitted under C-4261-49. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Upon recommencing operation, source testing to demonstrate compliance with the 99.5% overall VOC control efficiency of the "fermentation" (aka "CO2") scrubber vented to the RTO shall be conducted at least once every twelve (12) months. Source testing shall be conducted under conditions representative of normal operations and while no denatured ethanol is being processed through the loading rack permitted under C-4261-49. [District Rule 2201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
19. Source testing to determine the rate of VOC, measured in ppmv and converted to lb-VOC/gal-ethanol produced, shall be conducted using EPA Method 25 or 25A in conjunction with the results of EPA Method 18 conducted previously on the exhaust of the scrubber serving the fermentation process at Pacific Ethanol Madera or Pacific Ethanol Stockton. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
20. During source testing, permittee shall maintain records of the amount of ethanol produced, in gal-ethanol/hour. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The "fermentation" (aka "CO2") scrubber shall be equipped with a water flow meter, in operation at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The water flow rate through the "fermentation" (aka "CO2") scrubber shall not be less than 30 gal/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Upon recommencing operation, the permittee shall monitor and record the water flow rate through the "fermentation" (aka "CO2") scrubber at least once every day. [District Rule 2201] Federally Enforceable Through Title V Permit
25. If the water flow rate through the "fermentation" (aka "CO2") scrubber is less than 30 gal/minute, the permittee shall correct the water flow rate to exceed 30 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate through the "fermentation" (aka "CO2") scrubber continues to be less than 30 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Upon recommencing operation, the permittee shall maintain daily records of (1) the date of water flow rate measurements, (2) the water flow rate through the "fermentation" (aka "CO2") scrubber at the time of measure, and (3) a description of any corrective action taken to maintain the water flow rate above the 30 gal/minute limit. [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.

27. Valves, threaded connections, and flanges shall not leak VOCs in excess of 100 ppmv above background when measured in accordance with EPA Method 21, provided the total number of leaking tagged components of any component type does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
28. Pressure relief valves (PRVs) shall not leak VOC's in excess of 100 ppmv above background when measured in the plane at the centroid of any atmospheric vent with an instrument calibrated with methane, provided the total number of leaking PRVs does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
29. Process drains shall not leak VOC's in excess of 100 ppmv above background when measured at a distance of one (1) centimeter of the potential source with an instrument calibrated with methane, provided the total number of leaking process drains does not exceed 0.5 percent of the total number of components inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
30. Pumps or compressors which handle a VOC or any associated seal fluid system which circulates a fluid through or between seals on process pumps or compressors shall not leak in excess of 500 ppmv above background when measured in accordance with EPA Method 21. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
31. Upon recommencing operation, this operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit C-4261-0. [District Rule 4455] Federally Enforceable Through Title V Permit
32. Upon recommencing operation, this operation shall comply with the requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, as specified on facility wide permit C-4261-0. [40 CFR 60.480 and 60.481] Federally Enforceable Through Title V Permit
33. All records shall be retained on site for a minimum of five (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.