



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

OCT. 20 2014



HEALTHY AIR LIVING™

Daniel Lee
Paramount Farms International LLC
13646 Highway 33
Lost Hill, CA 93249

RE: Final – Authority to Construct/Certificate of Conformity (Minor Mod)
Facility Number: S-377
Project Number: S-1143168

Dear Mr. Lee:

The Air Pollution Control Officer has issued the Authority to Construct permits to Paramount Farms International LLC for replacement of a flare with a wet scrubber serving a propylene oxide fumigation operation S-377-9. Additionally, emissions from the existing PPO degassing operation were revised and administratively transferred to a separate permit (ATC S-377-55-0), at 13646 Highway 33, Lost Hills, CA.

Enclosed are the Authority to Construct permits and invoice for the engineering evaluation fees pursuant to District Rule 3010. The District's analysis of the proposal was sent to US EPA Region IX on August 19, 2014. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:rue

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.healthyliving.com

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



AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-9-7

ISSUANCE DATE: 10/20/2014

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

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

SECTION: 23 **TOWNSHIP:** 26S **RANGE:** 19E

EQUIPMENT DESCRIPTION:

MODIFICATION OF PROPYLENE OXIDE FUMIGATION OPERATION WITH 3,428 CU FT STERILIZATION CHAMBER EXHAUSTING TO A JOHN ZINK OPEN FLARE WITH TWO 50,000 BTU/HR PILOTS; REMOVE JOHN ZINK OPEN FLARE WITH TWO 50,000 BTU/HR PILOTS AND REPLACE WITH WET SCRUBBER, DECREASE DAILY THROUGHPUT LIMIT FROM 600 LB-PPO PER DAY TO 540 LB-PPO PER DAY

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Propylene oxide (PPO) shall be the only fumigant used in this fumigation chamber unless otherwise approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All fumigant shall be vented only to the scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-377-9-7 : Oct 20 2014 1:47PM -- EDGEHILR : Joint Inspection NOT Required

7. During fumigation operations, the chamber shall be tightly sealed or shall maintain negative pressure sufficient to prevent fumigant leakage. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The control efficiency of the scrubber serving this fumigation operation shall be at least 98% for volatile organic compound (VOC) emissions from propylene oxide. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The scrubber shall be adjusted and maintained to achieve optimum control efficiency according to manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The scrubber liquid pH shall not exceed 2.0 during all fumigation chamber venting. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
12. The amount of fumigant used in this chamber shall not exceed 270 lb-PPO/cycle. [District Rule 2201] Federally Enforceable Through Title V Permit
13. VOC emissions from the exhaust of the scrubber, when serving this fumigation chamber, shall not exceed 7.6 lb/day, equivalent to the maximum use of 540 lb-PPO fumigant/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC emissions from the exhaust of the scrubber, when serving this fumigation chamber and equivalent to a maximum use of 55,750 lb-PPO fumigant/year, shall not exceed 782 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The amount of nuts fumigated in this chamber shall not exceed 50 ton in any one day (equivalent to 25 ton (50,000 lb) nutmeats/cycle and 2 cycles/day). [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall maintain a record of the daily and cumulative annual (for the calendar year) usage of propylene oxide, and all scrubber pH measurements made. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. Records of the amount of nuts (in pounds) fumigated shall be maintained and updated daily. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. 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]



AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-55-0

ISSUANCE DATE: 10/20/2014

LEGAL OWNER OR OPERATOR: PARAMOUNT FARMS

MAILING ADDRESS: ATTN: DANIEL LEE
13646 HIGHWAY 33
LOST HILLS, CA 93249-9719

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

EQUIPMENT DESCRIPTION:

PROPYLENE OXIDE OFF-GASSING OPERATION CONDUCTED INSIDE BUILDING [APPROX. SIZE 59 FT (L) X 39 FT (W) X 23 FT (H)] WITH TWO EXHAUST FANS

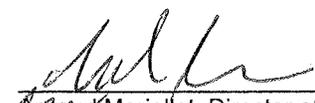
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. All off-gassing for the propylene oxide (PPO) fumigation operation shall be conducted inside the enclosed off-gas warehouse with exhaust fan operating and doors closed when not transferring nuts to and from the warehouse. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

S-377-55-0 : Oct 20 2014 1:25PM - EDGEHLR : Joint Inspection NOT Required

7. The amount of fumigant used in the fumigation chamber shall not exceed 270 lb-PPO/cycle. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The amount of fumigated nuts transferred to this warehouse from the fumigation chamber shall not exceed 50 ton in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The amount of fumigated nuts stored in this warehouse for off-gassing shall not exceed 10,324,104 lb in one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC (PPO) emissions from this operation shall not exceed 39.6 lb in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Records of the amount of nuts (in pounds) transferred to the post-fumigation off-gassing warehouse shall be maintained and updated daily. [District Rules 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]