



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV 08 2012

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

Re: **Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)**
District Facility # S-7063
Project # 1123623

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for California Dairies Inc, located at 2000 North Plaza Drive, Visalia, CA, which has been issued a Title V permit. California Dairies Inc is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The project authorizes replacement of the silo daily throughput limit with a Specific Limiting Condition (SLC).

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # S-7063-3-2, '-4-2, '-5-2, '-6-2, '-13-2, '-14-2, '-15-2, and '-16-2 with Certificate of Conformity. After demonstrating compliance with the Authorities 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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Richard Edgehill, Permit Services

Seyed Sadredin

Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV 08 2012

Si Dang Le
California Dairies Inc
2000 North Plaza Drive
Visalia, CA 93291

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-7063
Project # 1123623**

Dear Mr. Le:

Enclosed for your review is the District's analysis of your application for Authorities 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 project authorizes replacement of the silo daily throughput limit with a Specific Limiting Condition (SLC).

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authorities 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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Richard Edgehill, Permit Services

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San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Specific Limit Condition for Silos

Facility Name: California Dairies Inc Date: November 6, 2012
Mailing Address: 2000 North Plaza Drive Engineer: Richard Edgehill
Visalia, CA 93291 Lead Engineer: Richard Karrs
Contact Person: Sy Dang Le and Richard Wilson (WZI Inc)
Telephone: (559) 233-5154 (SDL) and (661) 326-1112 (RW)
Fax: (559) 268-5101
E-Mail: sle@californiadairies.com
Application #(s): S-7063-3-2 through '-6-2 and '-13-2 through '-16-2
Project #: 1123623
Deemed Complete: October 4, 2012

I. Proposal

California Dairies Inc (CDI) has requested ATCs to add Specific Limiting Conditions (SLCs) to silo permits S-7063-3 through '-6 and '-13 through '-16. Daily throughput for each of two groups of silos, S-7063-3 through '-6 and '-13 through '-16 will be limited to 1020.8 tons/day. The following revisions will be made to the PTOs (strikeout condition deleted and underlined condition new):

S-7063-3, -4, -5, -6:

~~The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Y~~

The total amount of milk powder transferred to silos #1, 2, 3, and 4 (S-7063-3, -4, -5, -6) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Y

S-7063-13, -14, -15, -16:

~~The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Y~~

The total amount of milk powder transferred to silos #5, 6, 7, and 8 (S-7063-13, -14, -15, -16) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Y

With the addition of the daily SLC, any of the silos S-7063-3 through '-6 or '-13 through '-16 could receive up to 1020.8 tons/day milk powder resulting in an increase in permitted daily emissions.

The project triggers BACT. However, offsets and public notice are not required.

Disposition of Outstanding ATCs

There are no outstanding ATCs for units S-7063-3, -4, -5, -6, -13, -14, -15, -16. Current PTOs are included in **Attachment I**.

CDI received their Title V Permit on July 31, 2012. This modification can be classified as a Title V minor modification pursuant to Rule 2520, 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. CDI Oilfield must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4202	Particulate Matter Emission Rate (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 2000 North Plaza Drive, Visalia, 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 powdered milk storage silos are used to store various types of powdered milk prior to the product packaging. All silos are designed to have 5,000 cubic foot storage capacity. The silos are configured so that only one silo can be filled or emptied at any given time. Each silo is served by a bin vent filter.

V. Equipment Listing

Pre-Project Equipment Description:

- S-7063-3-1: 37,403 GALLON POWDER MILK STORAGE SILO #1 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-4-1: 37,403 GALLON POWDER MILK STORAGE SILO #2 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-5-1: 37,403 GALLON POWDER MILK STORAGE SILO #3 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-6-1: 37,403 GALLON POWDER MILK STORAGE SILO #4 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-13-1: 37,403 GALLON POWDER MILK STORAGE SILO #5 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-14-1: 37,403 GALLON POWDER MILK STORAGE SILO #6 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-15-1: 37,403 GALLON POWDER MILK STORAGE SILO #7 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-16-1: 37,403 GALLON POWDER MILK STORAGE SILO #8 SERVED BY 1,000 CFM BIN VENT FILTER

Proposed Modification:

- S-7063-3-2 through '-6-2: ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-3, '-4, '-5, AND '-6
- S-7063-13-2 through '-16-2: ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-13, '-14, '-15, AND '-16

Post Project Equipment Description:

- S-7063-3-2: 37,403 GALLON POWDER MILK STORAGE SILO #1 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-4-2: 37,403 GALLON POWDER MILK STORAGE SILO #2 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-5-2: 37,403 GALLON POWDER MILK STORAGE SILO #3 SERVED BY 1,000 CFM BIN VENT FILTER
- S-7063-6-2: 37,403 GALLON POWDER MILK STORAGE SILO #4 SERVED BY 1,000 CFM BIN VENT FILTER

S-7063-13-2: 37,403 GALLON POWDER MILK STORAGE SILO #5 SERVED BY 1,000 CFM
BIN VENT FILTER

S-7063-14-2: 37,403 GALLON POWDER MILK STORAGE SILO #6 SERVED BY 1,000 CFM
BIN VENT FILTER

S-7063-15-2: 37,403 GALLON POWDER MILK STORAGE SILO #7 SERVED BY 1,000 CFM
BIN VENT FILTER

S-7063-16-2: 37,403 GALLON POWDER MILK STORAGE SILO #8 SERVED BY 1,000 CFM
BIN VENT FILTER

VI. Emission Control Technology Evaluation

Particulate matter less than 10 microns in aerodynamic diameter (PM10) are the only pollutant of concern emitted from the proposed silos which will be served by bin vent filters (dust collectors). The dust collectors are expected to have a control efficiency of 99%.

VII. General Calculations

A. Assumptions

Operation: 24 hr/day, 365 days/yr

Pre-Project (S-7063-3 through '-6 and '-13 through '-16)

Daily throughput: 255.2 tons/day

Post-Project

SLC throughput: 1020.8 tons/day (S-7063-3 through '-6)

SLC throughput: 1020.8 tons/day (S-7063-13 through '-16)

The project results in no change in annual emissions for the silos.

B. Emission Factors

PM10 emissions factor: 0.0055 lb/ton

C. Calculations

1. Pre-Project Potential to Emit (PE1)

S-7063-3 through '-6 and '-13 through '-16 (each)

255.2 tons/day x 0.0055 lb PM₁₀/ton = 1.4 lb PM₁₀/day (512 lb PM₁₀/yr)

2. Post Project Potential to Emit (PE2)

S-7063-3 through '-6 (SLC)

1020.8 tons/day x 0.0055 lb PM₁₀/ton = 5.6 lb PM₁₀/day

512 lb PM₁₀/yr x 4 = 2048 lb PM₁₀/yr

S-7063-13 through '-16 (SLC)

1020.8 tons/day x 0.0055 lb PM₁₀/ton = 5.6 lb PM₁₀/day

512 lb PM₁₀/yr x 4 = 2048 lb PM₁₀/yr

Greenhouse Gas (GHG) Emissions

The silos do not emit GHG and therefore no increases in GHG emissions are expected.

Emissions profiles are included in **Attachment II***

* Annual SLC emissions are included on S-7063-3 and 13 for convenience.

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

Pursuant to District Rule 2201, the 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 (AER) that have occurred at the source, and which have not been used on-site. The facility has no ERCs for Actual Emissions Reductions (AER) that have occurred at the source.

Pre Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
S-7063-3	0	0	512	0	0
S-7063-4	0	0	512	0	0
S-7063-5	0	0	512	0	0
S-7063-6	0	0	512	0	0
S-7063-7	14016	999	16347	79541	1927
S-7063-8	4414	1573	4194	20420	3035
S-7063-9	4414	1573	4194	20420	3035
S-7063-10	0	0	2268	0	0
S-7063-12	14016	999	16347	79541	1927
S-7063-13	0	0	512	0	0
S-7063-14	0	0	512	0	0
S-7063-15	0	0	512	0	0
S-7063-16	0	0	512	0	0
S-7063-17	258	0	4	31	6
S-7063-18	3422	1573	4194	20420	3035
S-7063-19	4282	1242	9152	12059	1601
S-7063-20	4282	1242	9152	12059	1601
SSPE1	49,104	9,201	69,948	244,491	16,167

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

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
S-7063-3	0	0	2048	0	0
S-7063-4	0	0		0	0
S-7063-5	0	0		0	0
S-7063-6	0	0		0	0
S-7063-7	14016	999	16347	79541	1927
S-7063-8	4414	1573	4194	20420	3035
S-7063-9	4414	1573	4194	20420	3035
S-7063-10	0	0	2268	0	0
S-7063-12	14016	999	16347	79541	1927
S-7063-13	0	0	2048	0	0
S-7063-14	0	0		0	0
S-7063-15	0	0		0	0
S-7063-16	0	0		0	0
S-7063-17	258	0	4	31	6
S-7063-18	3422	1573	4194	20420	3035
S-7063-19	4282	1242	9152	12059	1601
S-7063-20	4282	1242	9152	12059	1601
SSPE1	49,104	9,201	69,948	244,491	16,167

5. Major Source Determination

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. However, for the purposes of determining major source status, the SSPE2 shall not include the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.”

Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	49,104	9,201	69,948	244,491	16,167
SSPE2	49,104	9,201	69,948	244,491	16,167
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	Yes	No

As seen in the table above, the facility is not an existing Major Source for NO_x and CO and is not becoming a Major Source for SO_x, PM₁₀, or VOCs as a result of this project..

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 District Rule 2201, BE = PE1 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 District Rule 2201.

Clean Emissions Unit, Located at a Major Source

Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

This emissions unit is equipped with a bin vent filter which is achieved-in-practice BACT of current BACT Guideline 8.4.1 (**Attachment III**).

7. SB 288 Major Modification

SB 288 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."

Since this facility is not a major source for PM₁₀, the only pollutant addressed in this project, this project does not constitute an SB 288 major modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this facility is not a Major Source for PM₁₀, which is the only pollutant emitted by the silos, this project does not constitute a Federal Major Modification. Additionally, since the facility is not a major source for PM₁₀ (140,000 lb/year), it is not a major source for PM_{2.5} (200,000 lb/year).

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. There is no increase in annual emissions proposed for units S-7063-3 through '6 and 13 through '16 and therefore QNEC = 0.

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. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- 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 an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*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

$$\text{AIPE} = \text{PE}_2 - \text{HAPE}$$

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)

$$\text{HAPE} = \text{PE}_1 \times (\text{EF}_2/\text{EF}_1)$$

Where,

PE1 = The emissions unit's PE 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

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

S-7063-3 through '-6 and '-13 through '-16 (each):

$$\text{EF2} = \text{EF1} (0.01, 99\% \text{ control of PM}_{10})$$

$$\begin{aligned} \text{AIPE} &= 5.6 - (1.4 * (0.01/0.01)) \\ &= 5.6 - 1.4 * 1 \\ &= 4.2 \text{ lb/day} \end{aligned}$$

As demonstrated above, the AIPE is greater than 2.0 lb/day for PM₁₀ emissions. Therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.7 above, this project does not constitute an SB 288 nor Federal Major Modification for NO_x emissions. Therefore BACT is not triggered for any pollutant.

2. BACT Guideline

BACT Guideline 8.4.1 "Dry Material Storage and Conveying Operation, 100 tons/day" applies to the new milk powder storage silos (See **Attachment III**).

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule. BACT has been satisfied with the following:

Achieved-in-Practice: PM₁₀ storage, augers, elevators, conveyors all enclosed and vented to fabric filter baghouse

The BACT Analysis is included in **Attachment IV**.

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
SSPE2	49,104	9,201	69,948	244,491	16,167
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets calculations required?	Yes	No	Yes	Yes	No

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for NO_x and CO the SSPE2 is greater than the offset thresholds. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for NO_x is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = $(\sum[PE2 - BE] + ICCE) \times DOR$, 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 = PE1 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 = HAE

As calculated in Section VII.C.6 above, the BE from this unit are equal to the PE1 since the unit is a Clean Emissions Unit. There is no increase in annual emissions proposed and therefore offsets are not required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

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.

As demonstrated in VII.C.7, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE 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 PE > 100 lb/day.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	49,104	49,104	20,000 lb/year	No
SO _x	9,201	9,201	54,750 lb/year	No
PM ₁₀	69,948	69,948	29,200 lb/year	No
CO	244,491	244,491	200,000 lb/year	No
VOC	16,167	16,167	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.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	49,104	49,104	0	20,000 lb/year	No
SO _x	9,201	9,201	0	20,000 lb/year	No
PM ₁₀	69,948	69,948	0	20,000 lb/year	No
CO	244,491	244,491	0	20,000 lb/year	No
VOC	16,167	16,167	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE 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)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. 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:

- PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Y
- Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Y
- Maximum total amount of milk powder transferred to silos #1, 2, 3, and 4 (S-7063-3, '-4, '-5, and '-6) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Y

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

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) are listed on the permit to operate:

Permittee shall maintain accurate records of combined daily amounts of milk powder transferred into silos S-7063-3 through -6. [District Rule 1070 and Tulare County Rule 107] Y

All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Y

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.

In accordance with Rule 2520, 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/minor modification application. The Title V Modification Compliance Certification Form is included in **Attachment V**.

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). As the new and existing silos are served by bin vent filters with a PM₁₀ control efficiency expected to be greater than 99%, visible emissions are not expected. The following PTO conditions are also included on the ATCs:

Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Y

Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Y

Compliance is expected.

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 Hazardous Air Pollutant (HAP) emissions associated with this project, 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.

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM}_{10} \text{ emissions rate}) \times (7,000 \text{ gr/lb})}{(1200 \text{ scfm}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM₁₀ emission rate = 5.6 lb/day. Assuming 100% of PM is PM₁₀
Exhaust Gas Flow = 1000 scfm

$$\begin{aligned} \text{PM Conc. (gr/scf)} &= [(5.6 \text{ lb/day}) * (7,000 \text{ gr/lb})] \div [(1000 \text{ ft}^3/\text{min}) * (60 \text{ min/hr}) * (24 \text{ hr/day})] \\ \text{PM Conc.} &= 0.03 \text{ gr/scf} \\ \text{Compliance is expected.} \end{aligned}$$

Rule 4202 Particulate Matter Emission Rate

The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates.

Per section 4.1, particulate matter emissions from any source operation shall not exceed the allowable hourly emission rate as calculated using the following applicable formulas:

$$\begin{aligned} E &= 3.59 \times P^{0.62} && \text{if } P \leq 30 \text{ tons/hr} \\ E &= 17.31 \times P^{0.16} && \text{if } P > 30 \text{ tons/hr} \end{aligned}$$

Where,

E = emissions in lb/hr

P = process weight rate in tons/hr

Assumptions:

The maximum process weight is 1020.8 tons/day.

The maximum daily operating schedule is 24 hr/day.

Calculations:

$$1020.8 \text{ tons/day} \times \text{ton}/2000 \text{ lbs} \times \text{day}/24 \text{ hr} = 0.021 \text{ tons/hr}$$

$$\begin{aligned} E &= 3.59 P^{0.62} \\ &= \mathbf{0.33 \text{ lb PM/hr}} \end{aligned}$$

The applicant has proposed a maximum emission rate of 0.23 lb PM₁₀/hr (5.6 lb PM₁₀/day ÷ 24 hr) from existing silos. Assuming PM₁₀ is at least 70% of PM for milk powder, compliance with this rule is expected. This is supported by published data on the particle size distribution of powdered milk (**Attachment VI**).

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; and
- 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)).

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.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs S-7063-3-2 through '6-2 and '13-2 through '16-2 subject to the permit conditions on the attached draft ATCs in **Attachment VII**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-7063-3 through '6 and '13 through '16	3020-05-C	37,403 gallons	\$135.00

Attachments

- I: Current PTO(s)
- II: Emissions Profile
- III: BACT Guideline
- IV: BACT Analysis
- V: Title V Compliance Certification Form
- VI: Milk Powder Particle Size Distribution
- VII: Draft ATCs

Attachment I
Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-3-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

37,403 GALLON POWDER MILK STORAGE SILO #1 SERVED BY 1,000 CFM BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of daily amount of milk powder transferred to the silo. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
5. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
6. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
7. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-4-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

37,403 GALLON POWDER MILK STORAGE SILO #2 SERVED BY 1,000 CFM BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of daily amount of milk powder transferred to the silo. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
5. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
6. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
7. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-5-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

37,403 GALLON POWDER MILK STORAGE SILO #3 SERVED BY 1,000 CFM BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of daily amount of milk powder transferred to the silo. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
5. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
6. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
7. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-6-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

37,403 GALLON POWDER MILK STORAGE SILO #4 SERVED BY 1,000 CFM BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of daily amount of milk powder transferred to the silo. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
5. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
6. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
7. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-13-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

37,403 GALLON POWDER MILK STORAGE SILO #5 SERVED BY BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the bin vent shall not exceed 0.059 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of daily amount of milk powder transferred to the silo. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
5. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
6. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
7. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-14-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

37,403 GALLON POWDER MILK STORAGE SILO #6 SERVED BY BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the bin vent shall not exceed 0.059 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of daily amount of milk powder transferred to the silo. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
5. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
6. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
7. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-15-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

37,403 GALLON POWDER MILK STORAGE SILO #7 SERVED BY BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the bin vent shall not exceed 0.059 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of daily amount of milk powder transferred to the silo. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
5. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
6. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
7. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-16-1

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

37,403 GALLON POWDER MILK STORAGE SILO #8 SERVED BY BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the bin vent shall not exceed 0.059 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The amount of milk powder transferred to each silo shall not exceed 255.2 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of daily amount of milk powder transferred to the silo. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
5. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
6. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
7. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

Attachment II Emissions Profiles

Permit #: S-7063-3-2	Last Updated
Facility: CALIFORNIA DAIRIES, INC	11/05/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	2048.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	5.6	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-7063-4-2	Last Updated
Facility: CALIFORNIA DAIRIES, INC	11/05/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0		0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	5.6	0.0	
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-7063-5-2	Last Updated
Facility: CALIFORNIA DAIRIES, INC	11/05/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0		0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	5.6	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-7063-6-2	Last Updated
Facility: CALIFORNIA DAIRIES, INC	11/05/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0		0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	5.6	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-7063-13-2	Last Updated
Facility: CALIFORNIA DAIRIES, INC	11/05/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	2048.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	5.6	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-7063-14-2	Last Updated
Facility: CALIFORNIA DAIRIES, INC	11/05/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0		0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	5.6	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-7063-15-2	Last Updated
Facility: CALIFORNIA DAIRIES, INC	11/05/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0		0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	5.6	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-7063-16-2	Last Updated
Facility: CALIFORNIA DAIRIES, INC	11/05/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0		0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	5.6	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

**Attachment III
BACT Guideline**

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 8.4.1*

Last Update 10/20/1992

Dry Material Storage and Conveying Operation, 100 tons/day

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
PM10	Storage, augers, elevators, conveyors all enclosed and vented to a fabric filter baghouse		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

Attachment IV BACT Analysis

1. BACT Analysis for PM10 Emissions:

a. Step 1 - Identify all control technologies

PM10 storage, augers, elevators, conveyors all enclosed and vented to fabric filter baghouse

b. Step 2 - Eliminate technologically infeasible options

None of the above options is technologically infeasible

c. Step 3 - Rank remaining options by control effectiveness

PM10 storage, augers, elevators, conveyors all enclosed and vented to fabric filter baghouse

d. Step 4 - Cost Effectiveness Analysis

The applicant has proposed the highest ranked option from Step 3. Therefore, per SJVUAPCD BACT policy, the cost effectiveness analysis is not required.

e. Step 5 - Select BACT

The subject silos vent only to bin vents filters (fabric filter baghouses). Therefore BACT has been satisfied.

Attachment V
Title V Modification Compliance Certification Form

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 AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: CALIFORNIA DAIRIES, INC.	FACILITY ID: S-7063
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: CALIFORNIA DAIRIES, INC.	
3. Agent to the Owner: WZI INC -	

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:

Sy Dang Le

Signature of Responsible Official

10/03/2012

Date

SY DANG LE

Name of Responsible Official (please print)

DIRECTOR OF ENVIRONMENTAL

Title of Responsible Official (please print)

Attachment VI
Particle Size Distribution of Powdered Milk

Particle Size Distribution Measurement of Powdered Milk

■ Introduction

Powdered milk (infant formula) starts out with typical cow's milk as the raw material, and various types of ingredients are added and modified as necessary for use by infants. Of course, since the initial raw material is cow's milk, one of the principal ingredients is fat globules.

When the powdered milk is dissolved in hot water in preparation of the milk formula, these fat globules float freely in the hot water, forming a so-called oil/water emulsion. The particle distribution of these fat globules can be measured using the laser diffraction and scattering technique.

Since it is believed that the particle distribution of

these fat globules can to some degree affect their digestion and absorption in the body, this is one of the physical properties that must be evaluated in the quality control process.

In this report, we introduce this measurement for 2 different kinds of powdered milk using the Shimadzu SALD-7101 Nano Particle Size Analyzer. In addition, we conducted testing to determine whether or not the fat globule particle size distribution was affected due to the hot water temperature used during preparation of the infant milk formula. These results also are presented.

■ Difference in Particle Size Distribution of 2 Types of Powdered Milk

The particle size distributions of 2 different powdered milk products were measured using the Shimadzu SALD-7101 Nano Particle Size Analyzer (Fig. 1). The measurement results are shown in Fig. 2.

The preparation directions specified that the products be dissolved in hot water at 70 °C or higher, and here we used hot water at 80 °C. Both powdered milk products had a relatively sharp distribution, with a

median particle size of about 1 μm .

Although both of these products were produced with the same objective, some degree of difference can be observed in their particle size distributions. This is thought to be due to a variety of factors, such as the technique for emulsifying the milk raw material, the influence of other constituents in the milk mixture, as well as the method of subsequent processing.

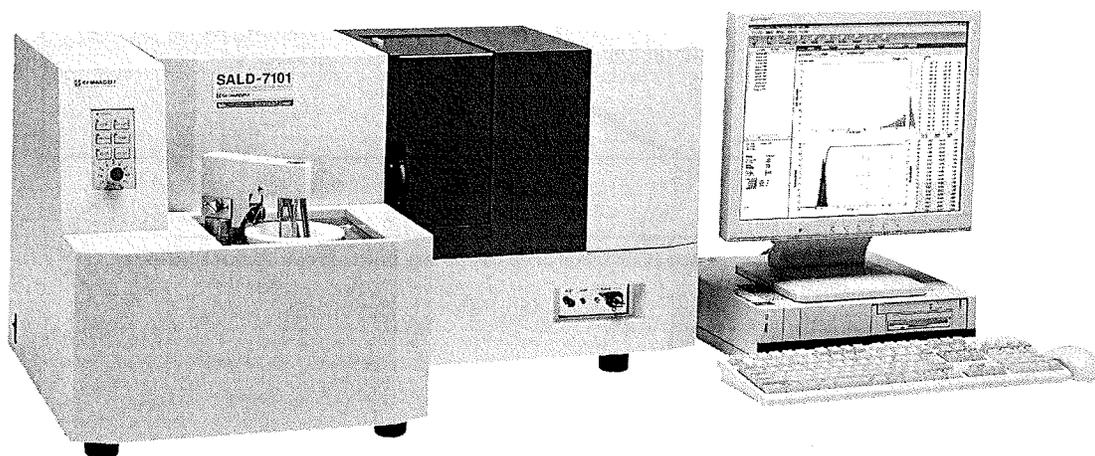


Fig. 1 Nano Particle Size Analyzer SALD-7101

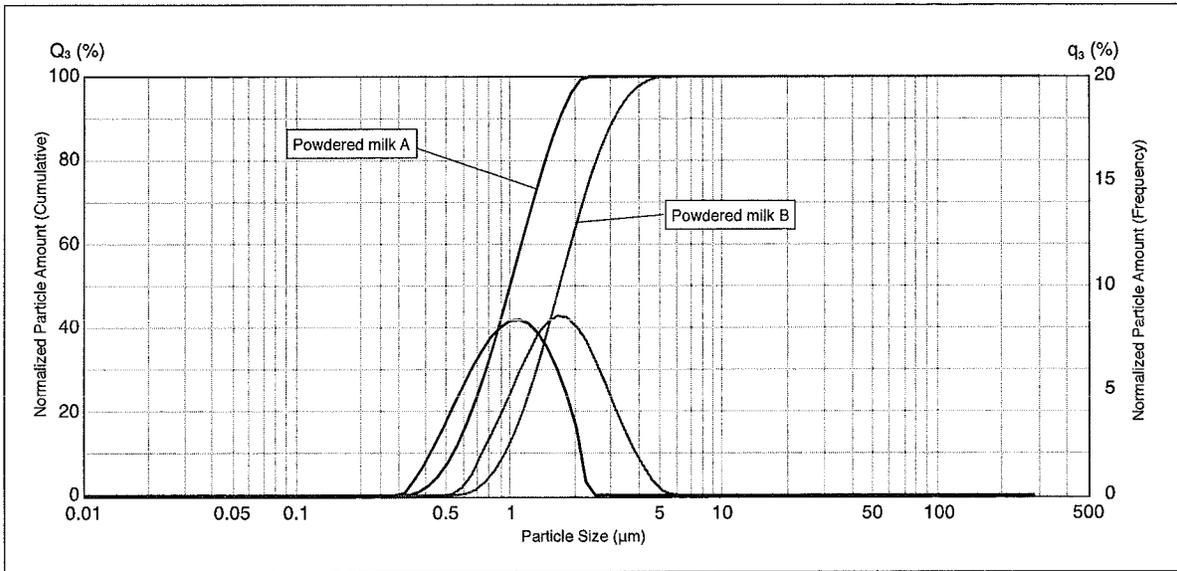


Fig. 2 Particle Size Distribution of 2 Types of Alumina Powder

■ Difference in Particle Size Distribution of Powdered Milk Due to Preparation Temperature

Next, to see whether or not there would be any difference in particle size distribution due to the actual milk preparation procedure, we prepared several milk samples using the abovementioned powdered milk B, but using hot water at different temperatures. Fig. 3 shows overlaid particle distribution curves generated using milk samples that were prepared with hot water at 80 °C, 40 °C and 23 °C, respectively.

Almost no difference is seen between 80 °C and 40 °C, but at 23 °C, the existence of somewhat coarse particles is observed.

Powdered milk is a powder produced by drying the original milk emulsion, but when it is returned to the emulsion state by dissolving it in hot water, it appears that its state depends on the preparation temperature.

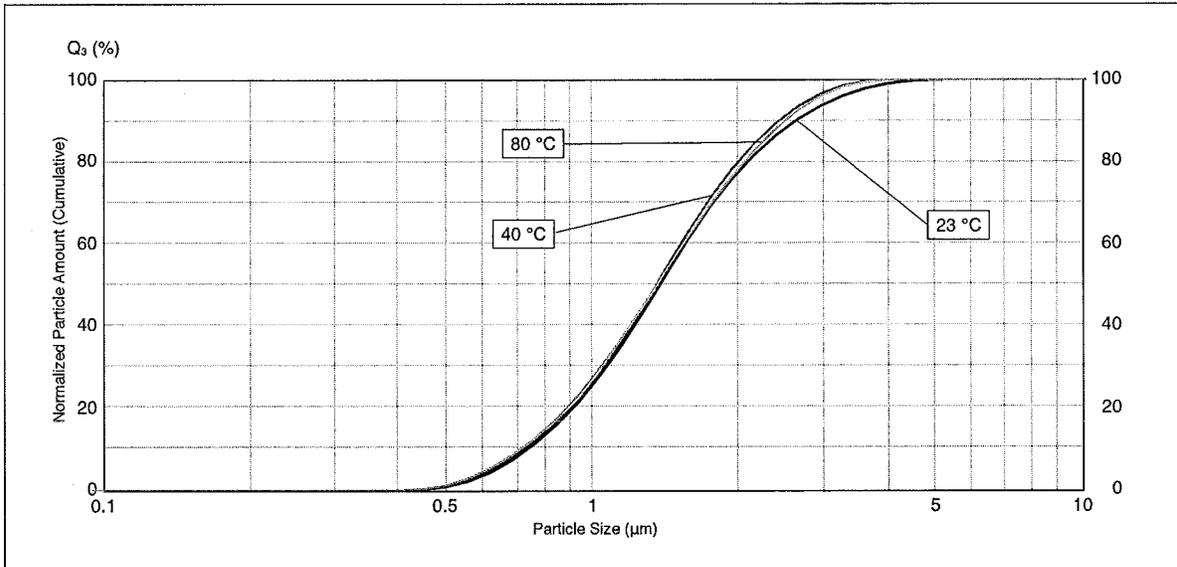


Fig. 3 Difference in Particle Size Distribution of Powdered Milk Due to Preparation Temperature



SHIMADZU CORPORATION, International Marketing Division

3, Kanda-Nishikicho 1-chome, Chiyoda-ku, Tokyo 101-8448, Japan Phone: 81(3)3219-5641 Fax: 81(3)3219-5710

**Attachment VII
Draft ATCs**

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-7063-3-2

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC
MAILING ADDRESS: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 37,403 GALLON POWDER MILK STORAGE SILO #1 SERVED BY 1,000 CFM BIN VENT FILTER:
ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-3, '-4, '-5, AND '-6

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 Rule 2201] 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. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Maximum total amount of milk powder transferred to silos #1, 2, 3, and 4 (S-7063-3, '-4, '-5, and '-6) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate records of combined daily amount of milk powder transferred into silos S-7063-3 through '-6. [District Rule 1070 and Tulare County Rule 107] 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

DRAFT

DAVID WARNER, Director of Permit Services

S-7063-3-2: Nov 6 2012 3:38PM - EDGEHILR : Joint Inspection NOT Required

8. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
9. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
10. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-7063-4-2

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC
MAILING ADDRESS: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 37,403 GALLON POWDER MILK STORAGE SILO #2 SERVED BY 1,000 CFM BIN VENT FILTER:
ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-3, '-4, '-5, AND '-6

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 Rule 2201] 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. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Maximum total amount of milk powder transferred to silos #1, 2, 3, and 4 (S-7063-3, '-4, '-5, and '-6) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate records of combined daily amount of milk powder transferred into silos S-7063-3 through '-6. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

DRAFT

DAVID WARNER, Director of Permit Services
S-7063-4-2: Nov 6 2012 3:36PM - EDGEHILR : Joint Inspection NOT Required

8. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
9. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
10. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-7063-5-2

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC
MAILING ADDRESS: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 37,403 GALLON POWDER MILK STORAGE SILO #3 SERVED BY 1,000 CFM BIN VENT FILTER:
ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-3, '-4, '-5, AND '-6

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 Rule 2201] 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. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Maximum total amount of milk powder transferred to silos #1, 2, 3, and 4 (S-7063-3, '-4, '-5, and '-6) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate records of combined daily amount of milk powder transferred into silos S-7063-3 through '-6. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services
S-7063-5-2 : Nov 6 2012 3:36PM - EDGEHILR : Joint Inspection NOT Required

8. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
9. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
10. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-7063-6-2

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC
MAILING ADDRESS: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 37,403 GALLON POWDER MILK STORAGE SILO #4 SERVED BY 1,000 CFM BIN VENT FILTER:
ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-3, '-4, '-5, AND '-6

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 Rule 2201] 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. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Maximum total amount of milk powder transferred to silos #1, 2, 3, and 4 (S-7063-3, '-4, '-5, and '-6) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate records of combined daily amount of milk powder transferred into silos S-7063-3 through '-6. [District Rule 1070 and Tulare County Rule 107] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-7063-6-2 : Nov 6 2012 3:36PM - EDGEHILR : Joint Inspection NOT Required

8. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
9. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
10. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-7063-13-2

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC
MAILING ADDRESS: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 37,403 GALLON POWDER MILK STORAGE SILO #5 SERVED BY BIN VENT FILTER: ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-13, '-14, '-15, AND '-16

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 Rule 2201] 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. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Maximum total amount of milk powder transferred to silos #5, 6, 7, and 8 (S-7063-13, '-14, '-15, and '-16) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate records of combined daily amount of milk powder transferred into silos S-7063-13 through '-16. [District Rule 1070 and Tulare County Rule 107] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-7063-13-2 : Nov 6 2012 3:36PM - EDGEHILL : Joint Inspection NOT Required

8. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
9. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
10. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: S-7063-14-2

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC
MAILING ADDRESS: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 37,403 GALLON POWDER MILK STORAGE SILO #6 SERVED BY BIN VENT FILTER: ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-13, '-14, '-15, AND '-16

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 Rule 2201] 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. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Maximum total amount of milk powder transferred to silos #5, 6, 7, and 8 (S-7063-13, '-14, '-15, and '-16) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate records of combined daily amount of milk powder transferred into silos S-7063-13 through '-16. [District Rule 1070 and Tulare County Rule 107] 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

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DAVID WARNER, Director of Permit Services
S-7063-14-2 : Nov 6 2012 3:36PM - EDGEHILR : Joint Inspection NOT Required

8. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
9. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
10. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-7063-15-2

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC
MAILING ADDRESS: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 37,403 GALLON POWDER MILK STORAGE SILO #7 SERVED BY BIN VENT FILTER: ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-13, '-14, '-15, AND '-16

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 Rule 2201] 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. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Maximum total amount of milk powder transferred to silos #5, 6, 7, and 8 (S-7063-13, '-14, '-15, and '-16) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate records of combined daily amount of milk powder transferred into silos S-7063-13 through '-16. [District Rule 1070 and Tulare County Rule 107] 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

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DAVID WARNER, Director of Permit Services

S-7063-15-2 : Nov 6 2012 3:36PM - EDGEHILR : Joint Inspection NOT Required

8. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
9. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
10. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: S-7063-16-2

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC
MAILING ADDRESS: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 37,403 GALLON POWDER MILK STORAGE SILO #8 SERVED BY BIN VENT FILTER: ADD SLC OF 1020.8 TONS/DAY POWDERED MILK TRANSFERRED TO S-7063-13, '-14, '-15, AND '-16

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 Rule 2201] 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. Visible emissions from the bin vent filter serving the silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the bin vent shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum amount of milk powder transferred to silo shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Maximum total amount of milk powder transferred to silos #5, 6, 7, and 8 (S-7063-13, '-14, '-15, and '-16) shall not exceed 1020.8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate records of combined daily amount of milk powder transferred into silos S-7063-13 through '-16. [District Rule 1070 and Tulare County Rule 107] 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

DAVID WARNER, Director of Permit Services

S-7063-16-2 : Nov 6 2012 3:36PM -- EDGEHILR : Joint Inspection NOT Required

8. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
9. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. 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] Federally Enforceable Through Title V Permit
10. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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