



FEB 07 2011

Dennis Tristao
J G Boswell Company Oil Mill
710 Bainum Avenue
Corcoran, CA 93212

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)
District Facility # C-1555
Project # C-1103826**

Dear Mr. Tristao:

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 applicant proposes various modifications to the preparation process unit permit C-1555-7 and the vegetable oil solvent plant unit permit C-1555-8.

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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Stanley Tom, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
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FEB 07 2011

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 # C-1555
Project # C-1103826

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for J G Boswell Company Oil Mill, located at 710 Bainum Avenue in Corcoran, CA, which has been issued a Title V permit. J G Boswell Company Oil Mill is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The applicant proposes various modifications to the preparation process unit permit C-1555-7 and the vegetable oil solvent plant unit permit C-1555-8.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # C-1555-7-10 and '8-11 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
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II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (12/18/08)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4202 Particulate Matter-Emission Rate (12/17/92)
Rule 4691 Vegetable Oil Processing Operations (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 710 Bainum Avenue in Corcoran, 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 facility processes cottonseed oil, safflower oil, corn oil and other oil bearing seeds on a rotational basis. Other than switching seeds, the process runs 24 hours per day, 7 days per week, 365 days per day.

The Oil Mill has five distinct processes which are performed between the raw seed and the finished oil. The first consists of cleaning the seed. The second consists of mechanical extraction of oil. The third consists of solvent extraction. The fourth consists of removal of impurities in the oil. The fifth consists of steam stripping.

The desolventizer/toaster (DT) unit is located within the third step above, being part of the Solvent Extraction System (Permit C-1555-8). In the solvent extraction plant the collets are washed in the solvent. The resulting oil/solvent mixture is referred to as miscella. After the oil has been removed from the collets, they leave the solvent extractor with approximately 30% solvent (hexane) content and 9% moisture content. The DT removes the hexane from the collets, thereby producing meal, and completing the toasting operation. The solvent laden collets enter the top of the DT at a temperature of 130 °F. Steam is provided from the Oil Mill main boiler (Permit C-1555-11-6), which has a total rated capacity of 34 MMBtu/hr. The steam is injected into the DT through the perforated bottom tray at saturation, 360 °F and 10 atmospheres. The steam strips the final solvent from the meal and then vents up through all the trays above. Counter current desolventization is therefore performed, meaning that collets of declining hexane concentration are moved down through rising steam vapors of increasing heat. The heat of the steam causes the hexane, which has a boiling point of 156 °F, to vaporize and mix with the steam. The DT chamber operates at atmospheric pressure. The collets are

evenly distributed onto the first main tray. Each main tray has hollow stay bolts for venting steam from one tray to the next. The quantity and position are carefully designed to allow maximum contact between steam and collets. At the top of the DT, vapors comprised of almost all hexane are drawn off at a slight vacuum and 180 °F. Most of the steam condenses into the meal because its temperature is less than the boiling point of water. No hexane condenses into the meal because its temperature is higher than the boiling point of hexane. The result is a very low solvent content in desolventized meal, and significantly reduced solvent losses. The meal is conveyed to a dryer before being placed in storage, where it is ultimately sold as animal feed.

Virgin vegetable oil from the expellers is filtered and then stored. There is heat and vacuum added to the process to improve the flowability of the vegetable oil. A clay product, is added to the vegetable to adsorb impurities and to agglomerate particles in suspension to facilitate filtration. This system was initially added to the facility in 1992.

V. Equipment Listing

Pre-Project Equipment Description:

PTO C-1555-7-7: 2,120 HP PREPARATION PROCESS UNIT WITH 126" CROWN IRON WORKS REDUCER, EXPANDERS, TWO (2) ROSKAMP 28X52 FLAKING MILLS, ONE (1) FERREL ROSS 24X48 HYD FLAKING MILL, ONE (1) KRUPPS EXPELLER, AND MECHANICAL AND PNEUMATIC TRANSFER SYSTEMS SERVED BY THREE (3) 36" 1D-3D CYCLONE COLLECTORS

PTO C-1555-8-9: 750 HP VEGETABLE OIL SOLVENT PLANT/REFINERY WITH CROWN IRON WORKS COMPANY EQUIPMENT INCLUDING A CROWN SERIES 900 EXTRACTOR, EVAPORATORS, A DESOLVENTIZER/TOASTER, ASSOCIATED EQUIPMENT SERVED BY THREE 30" 2D-2D CYCLONES AND TWO 6500 GALLONS SKIMMER/AERATION TANKS, ONE 10,000 GALLONS WASTE WATER STORAGE TANK, FOUR SUMPS, AND ONE 30,000 GALLONS EQUALIZATION TANK.

Proposed Modification:

ATC C-1555-7-10: MODIFICATION OF 2,120 HP PREPARATION PROCESS UNIT WITH 126" CROWN IRON WORKS REDUCER, EXPANDERS, TWO (2) ROSKAMP 28X52 FLAKING MILLS, ONE (1) FERREL ROSS 24X48 HYD FLAKING MILL, ONE (1) KRUPPS EXPELLER, AND MECHANICAL AND PNEUMATIC TRANSFER SYSTEMS SERVED BY THREE (3) 36" 1D-3D CYCLONE COLLECTORS: ADD TWO BAG DUMPING UNITS AND ASSOCIATED EQUIPMENT RELOCATED FROM PERMIT C-1555-8 CONSISTING OF TWO 2 HP CLAY BAG BREAKERS, TWO 15 HP OIL PUMPS, AND ONE 3 HP SLURRY TANK, ADD ONE HEAT EXCHANGER, ADD ONE 5 HP SEED BLEACHER, AND ADD ONE 7.5 HP VACUUM PUMP

Description	HP
Existing Equipment	2,120
Add Clay Bag Breaker	2
Add Clay Bag Breaker	2
Add Oil Pump	15
Add Oil Pump	15
Add Slurry Tank	3
Seed Bleacher	5
Vacuum Pump	7.5
Revised Total	2169.5

ATC C-1555-8-11: MODIFICATION OF 750 HP VEGETABLE OIL SOLVENT PLANT/REFINERY WITH CROWN IRON WORKS COMPANY EQUIPMENT INCLUDING A CROWN SERIES 900 EXTRACTOR, EVAPORATORS, A DESOLVENTIZER/TOASTER, ASSOCIATED EQUIPMENT SERVED BY THREE 30" 2D-2D CYCLONES AND TWO 6500 GALLONS SKIMMER/AERATION TANKS, ONE 10,000 GALLONS WASTE WATER STORAGE TANK, FOUR SUMPS, AND ONE 30,000 GALLONS EQUALIZATION TANK: REMOVE TWO BAG DUMPING UNITS AND ASSOCIATED EQUIPMENT RELOCATED TO PERMIT C-1555-7 CONSISTING OF TWO 2 HP CLAY BAG BREAKERS, TWO 15 HP OIL PUMPS, AND ONE 3 HP SLURRY TANK

Description	HP
Existing Equipment	750
Remove Clay Bag Breaker	2
Remove Clay Bag Breaker	2
Remove Oil Pump	15
Remove Oil Pump	15
Remove Slurry Tank	3
Revised Total	713

Post-Project Equipment Description:

PTO C-1555-7-10: PREPARATION PROCESS UNIT WITH 126" CROWN IRON WORKS REDUCER, EXPANDERS, TWO (2) ROSKAMP 28X52 FLAKING MILLS, ONE (1) FERREL ROSS 24X48 HYD FLAKING MILL, ONE (1) KRUPPS EXPELLER, MECHANICAL AND PNEUMATIC TRANSFER SYSTEMS SERVED BY THREE (3) 36" 1D-3D CYCLONE COLLECTORS, ONE SEED BLEACHER, AND TWO BAG DUMPING UNITS SERVED BY A MAC FILTER UNIT

PTO C-1555-8-11: VEGETABLE OIL SOLVENT PLANT/REFINERY WITH CROWN IRON WORKS COMPANY EQUIPMENT INCLUDING A CROWN SERIES 900 EXTRACTOR, EVAPORATORS, A DESOLVENTIZER/TOASTER, ASSOCIATED EQUIPMENT SERVED BY THREE 30" 2D-2D CYCLONES AND TWO 6500 GALLONS SKIMMER/AERATION TANKS, ONE 10,000 GALLONS WASTE WATER STORAGE TANK, FOUR SUMPS, AND ONE 30,000 GALLONS EQUALIZATION TANK AND ONE BAG DUMPING UNIT SERVED BY A MAC FILTER UNIT

VI. Emission Control Technology Evaluation

Clay added to the oil, to enhance the filtration process, is a negligible source of particulate emissions. The bags are emptied into an enclosed bin controlled by sock filter vent. Addition of a bleaching vessel, operated at a vacuum, will not increase particulate emissions. The vacuum system includes an expansion vessel, in the event liquid becomes entrained in the vacuum stream, to assure protection of the vacuum pump; it additionally assures no visible emissions at the vacuum exhaust point.

C-1555-7

Particulate Matter is the only pollutant of concern emitted from this operation. This operation will emit Particulate Matter with an aerodynamic diameter smaller than or equal to a nominal 10 microns (PM₁₀). PM₁₀ emissions are controlled using three (3) 1D-3D cyclones.

Cyclone Design Check

The inlet velocities of the existing cyclones will be checked using the following calculations:

$$V = Q/A$$

where,

V = Inlet Velocity (ft/min)

Q = Air Flow Rate (ft³/min)

A = inlet area (ft²) = Inlet Height (H_c) × Inlet Width (B_c)

Therefore:

$$V \text{ (ft/min)} = \frac{\text{Total Air Flow (cfm)}}{\text{Inlet Height (H}_c\text{) (ft)} \times \text{Inlet Width (B}_c\text{) (ft)}}$$

Based on the moisture content of seeds processed, the operator is able to adjust the air flow of the fan from 3,150 cfm to 4,100 cfm. In this range, the air velocity is calculated as follows:

Cyclone Dimensions		
Dimension	Meat Conveying System Cyclones x3	Meat Conveying System Cyclones x3
Cyclone Type	1D-3D	1D-3D
L _c Cylinder Height	36"	36"
Z _c Cone Height	108"	108"
D _c Cylinder Diameter	36"	36"

D_e Exit Tube Diameter	18"	18"
H_c Input Duct Height	36"	36"
I_c Input Duct Width	4.5"	4.5"
Q = Air Flow Rate (ft ³ /min)	3,150 ft ³ /min	4,100 ft ³ /min
V = Inlet Velocity (ft/min)	2,800 ft/min	3,640 ft/min

Using standards suggested by Texas A & M (ref: Modern Pollution Control Technology, pp. 22-4, Research & Education Assoc., 1978), the ideal air velocity for a 1D-3D cyclone is 3,200 ft/min \pm 400 ft/min.

The calculated air velocity for the proposed cyclone is within the range of the air velocity for an equivalent 1D-3D cyclone. Thus, the proposed cyclone is designed for optimum performances.

C-1555-8

VOC emissions from the solvent extraction facility consist of hexane and are controlled by a condenser and mineral oil scrubber. Hexane is recovered and reused in the oil-extraction process because of its high cost. The steam and hexane exhausts from the solvent extractor, desolventizer/toaster, and oil/hexane stripping are passed through condensers to recover hexane. Residual hexane from the condenser is captured by a mineral oil scrubber. Data shows that the capture efficiency of the hexane removal system is 100 percent. This is because the system is kept under vacuum so no solvent vapor will leak out, and the vent air is the collection point of every trace vapor present in any incoming oilseed or chemical, as well as any vapor generated in the process.

VII. General Calculations

The applicant proposes to revise the PM₁₀ emission rate for the bag dumping units. Therefore, the PM₁₀ emission rate will be revised according to District Policy APR 1110. There is no change in emissions from the bag dumping units in this project.

A. Assumptions

C-1555-7-10

- The maximum daily throughput of conditioned seed processed is:
 - 1,400 ton-conditioned seed/day, when the system is using mechanical conveyor system,
 - or
 - 420 ton-conditioned seed/day, when using the pneumatic conveyor backup system,
- For the bag dumping units, maximum material throughput = 1,500 lb/day (per applicant)
- PM₁₀ is the only pollutant emitted from the operation Grain conversion: 1 pound = 7,000 grains (AP-42-Appendix A-18)
- Maximum potential emissions are based on a 24 hours/day, 365 days/year

C-1555-8-11

- The VOC emissions from this permit are not being modified in this project
- For the bag dumping unit, maximum material throughput = 750 lb/day (per applicant)

B. Emission Factors

The current emission factor for the bag dumping units is 1.5 lb-PM₁₀/day. This emission factor cannot be referenced. Therefore, the emission factor will be re-established in this project for both pre-project and post-project emissions for the bag dumping units.

As a worst case scenario, the cement truck loading emission factor will be used for the bag dumping units in this project. It will be assumed cement would be a greater source of PM₁₀ emissions than clay material which is used in the bag dumping units.

Emission Factor		
		Source
PM ₁₀	0.0568 lb/ton (controlled)	AP42 Table 11.12-2 6/06

C-1555-7-10

Per the current PTO,

Daily PE = 1.2 lb-PM₁₀/day

C-1555-8-11

Emission factors are not changing and are derived from existing permit limits.

Per the current PTO,

Daily PE = 2,156 lb-VOC/day

C. Calculations

1. Pre-Project Potential to Emit (PE1)

C-1555-7-7

Per the current PTO,

Daily PE1 = 1.2 lb-PM₁₀/day

Annual PE1 = 1.2 lb-PM₁₀/day x 365 days/year
= 438 lb-PM₁₀/year

C-1687-8-9

Daily PE1 = 2,156.0 lb-VOC/day

Annual PE1 = 2,156.0 lb-VOC/day x 365 days/year
= 786,940 lb-VOC/year

For the bag dumping units,

1,500 lb/day x 0.0568 lb/ton ÷ 2000 lb/ton = 0.04 → 0.0 lb-PM₁₀/day

Daily PE1 = 0.0 lb-PM₁₀/day

Annual PE1 = 0.0 lb/day x 365 days/year
= 0 lb-PM₁₀/year

2. Post Project Potential to Emit (PE2)

C-1555-7-10

Per the current PTO,

Daily PE2 = 1.2 lb-PM₁₀/day

For the bag dumping units (to be relocated from permit C-1555-8),

1,500 lb/day x 0.0568 lb/ton ÷ 2000 lb/ton = 0.04 → 0.0 lb-PM₁₀/day

Total Daily PE2 = 1.2 lb/day + 0.0 lb/day
= 1.2 lb-PM₁₀/day

Annual PE2 = (1.2 + 0.0) lb/day x 365 days/year
= 438 lb-PM₁₀/year

C-1687-8-11

Daily PE2 = 2,156.0 lb-VOC/day

Annual PE2 = 2,156.0 lb-VOC/day x 365 days/year
= 786,940 lb-VOC/year

For the bag dumping unit,

750 lb/day x 0.0568 lb/ton ÷ 2000 lb/ton = 0.002 → 0.0 lb-PM₁₀/day

Total Daily PE2 = 0.0 lb-PM₁₀/day

Annual PE2 = 0.0 lb/day x 365 days/year
= 0 lb-PM₁₀/year

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

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

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
C-1555-2-4	0	0	3,781	0	0
C-1555-3-5	0	0	96,947	0	0
C-1555-6-5	0	0	12,264	0	0
C-1555-7-7	0	0	438	0	0
C-1555-8-9	0	0	0	0	786,940
C-1555-11-8	13,380	2,328	1,643	9,450	204
Pre-Project SSPE (SSPE1)	13,380	2,328	115,073	9,450	787,144

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

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Post-Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
C-1555-2-4	0	0	3,781	0	0
C-1555-3-5	0	0	96,947	0	0
C-1555-6-5	0	0	12,264	0	0
C-1555-7-7	0	0	438	0	0
C-1555-8-9	0	0	0	0	786,940
C-1555-11-8	13,380	2,328	1,643	9,450	204
Post-Project SSPE (SSPE2)	13,380	2,328	115,073	9,450	787,144

5. Major Source Determination

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

Major Source Determination (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
Pre-Project SSPE (SSPE1)	13,380	2,328	115,073	9,450	787,144
Post Project SSPE (SSPE2)	13,380	2,328	115,073	9,450	787,144
Major Source Threshold	50,000	140,000	140,000	200,000	50,000
Major Source?	No	No	No	No	Yes

As seen in the table above, the facility is not an existing Major Source and also is not becoming a Major Source 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 Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

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

otherwise,

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

As shown in Section VII.C.5 above, the facility is not a Major Source for PM₁₀. The emission units involved in this project are only a source of PM₁₀ emissions.

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

7. SB288 Major Modification

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

As discussed in Section VII.C.5 above, the facility is not a Major Source for PM₁₀ which is the only pollutant of concern in this project; therefore, the project does not constitute a SB 288 Major Modification.

8. Federal Major Modification

As discussed in Section VII.C.5 above, the facility is not a Major Source for PM₁₀ which is the only pollutant of concern in this project; therefore, the project does not constitute a Federal Major Modification.

9. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

$$\text{QNEC} = \text{PE2} - \text{BE},$$

where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
 PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
 BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/qtr.

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

The QNEC is calculated for each pollutant, for each unit of this project, as the difference between the post-project quarterly (Qtr PE2) emissions and the pre-project quarterly (Qtr PE1) emissions.

Quarterly Net Emissions Change (QNEC) Summary						
Permit		NO _x	SO _x	PM ₁₀	CO	VOC
C-1555-7	Qtr PE2 (lb/qtr)	0	0	110	0	0
	Qtr PE1(lb/qtr)	0	0	110	0	0
	Qtr ΔPE (lb/qtr)	0	0	0	0	0
C-1555-8	Qtr PE2 (lb/qtr)	0	0	0	0	196,735
	Qtr PE1(lb/qtr)	0	0	0	0	196,735
	Qtr ΔPE (lb/qtr)	0	0	0	0	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 for the following*:

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

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

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

As seen in Section VII.C.2 of this evaluation, the applicant is proposing to install a new heat exchanger, seed bleacher, and vacuum pump with a PE not exceeding 2 lb/day. BACT is not triggered, since the PE does not exceed 2 lbs/day.

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

As discussed in Section I above, there are two bag dumping emission units being relocated within the same stationary source which is exempt from the requirements of BACT per Rule 2201 Section 4.2.7. Therefore, BACT is not triggered.

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

As discussed in Section I above, there are no modified emissions units associated with this project; therefore BACT is not triggered.

d. Major Modification

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

B. Offsets

1. Offset Applicability

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

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

Offset Determination (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
Post Project SSPE (SSPE2)	13,380	2,328	115,073	9,450	787,144
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	Yes	No	Yes

2. Quantity of Offsets Required

As seen above, the SSPE2 is greater than the offset thresholds for PM₁₀ and VOC. However, the emission units being modified in this project are only a source of PM₁₀ emissions; therefore offset calculations will be required for PM₁₀ for this project.

Per Sections 4.7.1 and 4.7.3, 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) = $(\Sigma[PE2 - BE] + ICCE) \times DOR$, 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 = Pre-project Potential to Emit for:

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

otherwise,

BE = Historic Actual Emissions (HAE)

There are no increases in cargo carrier emissions; therefore offsets can be determined as follows:

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

PE2 (PM10)_{C-1555-7} = 438 lb/year

BE (PM10)_{C-1555-7} = 438 lb/year

PE2 (PM10)_{C-1555-8} = 0 lb/year

BE (PM10)_{C-1555-8} = 0 lb/year

ICCE = 0 lb/year

Assuming an offset ratio of 1.5:1, the amount of PM10 ERCs that need to be withdrawn is:

Offsets Required (lb/year) = $([438 - 438] + [0 - 0] + 0) \times 1.5$
 $= 0 \times 1.5$
 $= 0 \text{ lb PM}_{10}/\text{year}$

As demonstrated in the calculation above, the amount of offsets is zero; therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

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

a. New Major Source

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

b. Major Modification

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

c. PE > 100 lb/day

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

d. Offset Threshold

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

Offset Threshold				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	13,380	13,380	20,000 lb/year	No
SO _x	2,328	2,328	54,750 lb/year	No
PM ₁₀	115,073	115,073	29,200 lb/year	No
CO	9,450	9,450	200,000 lb/year	No
VOC	787,144	787,144	20,000 lb/year	No

As detailed in the preceding table, there were no offset thresholds surpassed with this project. Therefore, public noticing is not required for this project for surpassing the SSPE2 offset thresholds.

e. SSIPE > 20,000 lb/year

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

Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	13,380	13,380	0	20,000 lb/year	No
SO _x	2,328	2,328	0	20,000 lb/year	No
PM ₁₀	115,073	115,073	0	20,000 lb/year	No
CO	9,450	9,450	0	20,000 lb/year	No
VOC	787,144	787,144	0	20,000 lb/year	No

As detailed in the preceding table, there were no SSIPE thresholds surpassed with this project. Therefore, public noticing is not required for exceeding the SSIPE thresholds.

2. Public Notice Action

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

D. Daily Emission Limits (DELs)

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

Proposed Rule 2201 (DEL) Conditions:

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- The maximum daily throughput of conditioned seed shall not exceed 1,400 ton/day when the mechanical conveyor system is used. [District NSR Rule]
- The maximum throughput of conditioned seed shall not exceed 420 tons per day when the pneumatic conveyor backup system is used. [District NSR Rule]
- PM10 emissions from the preparation process unit shall not exceed 1.2 lb PM10/day. [District NSR Rule; District Rule 4202]

- The maximum amount of material processed by the bag dumping units shall not exceed 1,500 lb/day. [District NSR Rule]
- PM10 emissions from the bag dumping units shall not exceed 0.0568 lb/ton material processed. [District NSR Rule]

C-1555-8-11

- The Owner/Operator shall control the amount of fresh hexane so that the average rate over a three month period does not exceed 2,156 pounds per day. [District NSR Rule]
- The maximum amount of material processed by the bag dumping unit shall not exceed 750 lb/day. [District NSR Rule]
- PM10 emissions from the bag dumping unit shall not exceed 0.0568 lb/ton material processed. [District NSR Rule]

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 conditions will appear on the permit to operate:

C-1555-7-10

- Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and initials of the personnel performing the inspection. [District Rule 2520, 9.3.2]
- Record of daily conditioned seed throughput for the preparation process unit and daily amount of material processed by the bag dumping units shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070; District Rule 2520, 9.4.2]

C-1555-8-11

- Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and initials of the personnel performing the inspection. [District Rule 2520, 9.4.2]

- Record of daily amount of material processed by the bag dumping unit shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit pursuant to Section 3.20 of this rule:

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the the Title V administrative amendment application.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to vegetable oil production operations.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

40 CFR Part 63 Subpart GGGG - Solvent Extraction for Vegetable Oil Production

The facility owns and operates existing vegetable oil production plant subject to the requirements of this subpart. Pursuant to section §63.2834, the facility shall comply with the requirements of this subpart by April 21, 2004.

According to the latest Title V compliance report this facility is in compliance with all applicable requirements of this subpart.

Rule 4101 Visible Emissions

District Rule 4101, Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringelmann 1 or equivalent to 20% opacity. The following condition will be placed on the permit to assure compliance with this Rule.

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

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

The following condition will be placed on permit C-1555-7 and '8:

- Visible emissions from sock filters serving the bag dumping units shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule]

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. In addition, the following condition will be placed on the permit to assure compliance with this Rule.

- {98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

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

As demonstrated above, there are no increases in emissions associated with this project, 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.

Since the three (3) cyclones are identical, and based on PM₁₀ emission factor listed in Section VII above, the grain load from each cyclone is:

$$\frac{1.2 \text{ lb-PM}_{10}}{\text{day}} \times \frac{7,000 \text{ grain}}{\text{lb}} / \left(\frac{3,150 \text{ dscf}}{\text{min}} \times \frac{60 \text{ min}}{\text{hour}} \times \frac{24 \text{ hour}}{\text{day}} \right) = 0.002 \frac{\text{grain}}{\text{dscf}}$$

$$0.002 \text{ grain/dscf} < 0.1 \text{ grain/dscf}$$

Therefore, compliance with District Rule 4201 requirements is expected and the following condition will be listed on the permit:

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

Rule 4202 Particulate Matter – Emission Rate

Rule 4202 establishes PM emission limits as a function of process weight rate in tons/hr.

$$E_{\max} = 3.59 P^{0.62}, \text{ where } P < 30 \text{ tons/hr}$$

$$E_{\max} = 17.32 P^{0.16}, \text{ where } P > 30 \text{ tons/hr}$$

E = Emission in lb/hr

P = Process weight in tons/hr

$$P = 420 \text{ ton/day} / 24 \text{ hr/day} = 17.5 \text{ ton/hr}$$

The allowable hourly emission rate is:

$$E = 3.59 \times 17.5^{0.62} = 21.17 \text{ lb-PM}_{10}/\text{hr}$$

PM₁₀ emissions are expected to be:

$$1.2 \text{ lb-PM}_{10}/\text{day} / 24 \text{ hr/day} = 0.05 \text{ ton/hr}$$

0.05 lb-PM₁₀/hr is less than 21.17 lb-PM₁₀/hr

As demonstrated above, the proposed PM emission rates are less than the maximum allowable rates; therefore, compliance is expected.

District Rule 4691 Vegetable Oil Processing Operations

Section 5.1 requires that a "person shall not operate any extractor or desolventizer/toaster that emits more than 15 pounds of VOCs per day, (excluding the meal discharge) unless such emissions are controlled by one (1) of the following:

5.1.1 A condenser and mineral oil scrubber with a combined capture and control efficiency of at least 90 percent by weight; or

5.1.2 An emission control device, with a combined capture and control efficiency of at least 90 percent by weight, confirmed by source testing. Control device shall be under District permit.

Section 5.2 requires that a " ... person shall not operate a vegetable oil plant unless the desolventizer-toaster discharge conveyor prior to the cooler or tumbler is vented to a mineral oil scrubber having a combined capture and control efficiency of at least 90 percent by weight."

This vegetable oil solvent plant/refinery is subject to the source testing requirements of District Rule 4691, sections 6.2; therefore, source testing for VOC is required as specified by the rule.

Section 5.3 requires the owner/operator of a vegetable oil extraction plant inspect at least once a month all equipment in organic service for any indication of any leak of VOCs. Monthly inspections shall be done in accordance with EPA Method 21.

The applicant will be required to keep records of all of the parameters that are required by the Rule 4691. The applicant will be required to keep records of daily solvent consumption to ensure compliance with the DELs.

Therefore continued compliance is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions as this project only involves modification of units that emit particulate matter. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue Authorities to Construct C-1555-7-10 and '8-11 subject to the permit conditions on the attached draft Authorities to Construct in Attachment C.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-1555-7-10	3020-01-H	2169.5 HP ELECTRIC MOTOR RATING	\$1030.00
C-1555-8-11	3020-01-F	713 HP ELECTRIC MOTOR RATING	\$607.00

Attachments

- A: Current PTOs
- B: Certificate of Conformity
- C: Draft ATCs

Attachment A: Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1555-7-7

EXPIRATION DATE: 11/30/2007

EQUIPMENT DESCRIPTION:

2,120 HP PREPARATION PROCESS UNIT WITH 126" CROWN IRON WORKS REDUCER, EXPANDERS, TWO (2) ROSKAMP 28X52 FLAKING MILLS, ONE (1) FERREL ROSS 24X48 HYD FLAKING MILL, ONE (1) KRUPPS EXPELLER, AND MECHANICAL AND PNEUMATIC TRANSFER SYSTEMS SERVED BY THREE (3) 36" 1D-3D CYCLONE COLLECTORS

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The maximum daily throughput of conditioned seed shall not exceed 1,400 ton/day when the mechanical conveyor system is used. [District NSR Rule] Federally Enforceable Through Title V Permit
3. In the event of a breakdown of the expeller conveyor system, the operator shall use the pneumatic conveyor backup system, and the District shall be notified immediately. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The maximum throughput of conditioned seed shall not exceed 420 tons per day when the pneumatic conveyor backup system is used. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from the preparation process unit shall not exceed 1.2 lb PM10/day. [District NSR Rule; District Rule 4202] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. The particulate matter emissions shall comply with District Rule 4202, section 4.0 (12/17/92). [District Rule 4202] Federally Enforceable Through Title V Permit
8. Compliance with the above conditions shall be considered compliance with District Rules 4201 (12/17/92) and 4202 (12/17/92). Therefore, a permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. Dust collectors shall be inspected at least once every week while in operation for any cracks, holes, or malfunctions which might decrease the PM collection efficiency, and shall be repaired or replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and initials of the personnel performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Record of daily conditioned seed throughput for the preparation process unit shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070; District Rule 2520, 9.4.2] 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: C-1555-8-9

EXPIRATION DATE: 11/30/2007

EQUIPMENT DESCRIPTION:

750 HP VEGETABLE OIL SOLVENT PLANT/REFINERY WITH CROWN IRON WORKS COMPANY EQUIPMENT INCLUDING A CROWN SERIES 900 EXTRACTOR, EVAPORATORS, A DESOLVENTIZER/TOASTER, ASSOCIATED EQUIPMENT SERVED BY THREE 30" 2D-2D CYCLONES AND TWO 6500 GALLONS SKIMMER/AERATION TANKS, ONE 10,000 GALLONS WASTE WATER STORAGE TANK, FOUR SUMPS, AND ONE 30,000 GALLONS EQUALIZATION TANK.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Particulate matter emissions from the bag dumping system shall not exceed 1.5 pounds per hour. [District NSR Rule; District Rule 4202] Federally Enforceable Through Title V Permit
4. The Owner/Operator shall control the amount of fresh hexane so that the average rate over a three month period does not exceed 2,156 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The Owner/Operator shall maintain records such that daily vegetable oil seed material processing rates and hexane consumption can be determined. [District NSR Rule; District Rule 2520, 9.4.2; District Rule 4691, 6.1] Federally Enforceable Through Title V Permit
6. All vapors and gas streams from the extractor, wastewater reboiler, solvent-water separator, and dryer/toaster condenser shall be routed to the vent condenser and then to the mineral scrubber. [District NSR Rule; District Rule 4691, 5.2; Kings County Rule 410] Federally Enforceable Through Title V Permit
7. The condenser and mineral oil scrubber shall have a combined capture and control efficiency of at least 95 percent by weight. [District Rule 4691, 5.1; Kings County Rule 410] Federally Enforceable Through Title V Permit
8. The permittee shall conduct inspections at least once a month on all equipment in organic service for any indication of any leak of VOCs. Monthly inspections shall be done in accordance with EPA Method 21. [District Rule 4691, 5.3] Federally Enforceable Through Title V Permit
9. If a detected leakage level exceeds 10,000 ppm, or if leaks are visible, the leaking equipment shall be repaired within ten (10) days. [District Rule 4691, 5.3] Federally Enforceable Through Title V Permit
10. The owner/operator shall not use any equipment in organic service at the vegetable oil plant unless such equipment does not leak. [District Rule 4691, 5.4] Federally Enforceable Through Title V Permit
11. Emissions from leaks in equipment in organic service which have been tagged by the owner or operator for repair in accordance with the requirements of Section 6.1 of Rule 4691 (12/17/92) or which have been repaired and are waiting reinspection shall not constitute a violation of Section 5.4 of Rule 4691 (12/17/92). [District Rule 4691, 5.5] Federally Enforceable Through Title V Permit
12. The owner/operator shall comply with all the recordkeeping and monitoring requirements of section 6.0 of Rule 4691 (12/17/97). [District Rule 4691, 6.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The owner/operator shall check the oil temperature at various points. The oil from the heater shall be between 230 F and 255 F. The oil from the cooler shall be less than 100 F. [District Rule 4691, 5.1; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. The extractor shall run under a vacuum of at least 0.1 inches of water. [District Rule 4691, 5.1; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Compliance with the above conditions shall be considered compliance with District Rules 4201 (12/17/92), 4202 (12/17/92), and 4691 (12/17/92). Therefore, a permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
16. Dust collectors shall be inspected at least once every week while in operation for any cracks, holes, or malfunctions which might decrease the PM collection efficiency, and shall be repaired or replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and initials of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. The owner/operator shall perform EPA Method 18 on an annual basis to determine compliance with District Rule 4691 (12/17/92). [District Rule 4691; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. On and after compliance date, for each operating month, the permittee must calculate the compliance ratio in accordance with methods and procedures specified in 40 CFR 63.2840 (a), (b), and (d). The compliance ratio shall not exceed 1.0. [40 CFR 63.2840] Federally Enforceable Through Title V Permit
20. The permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of section §63.2850 for sources under normal operation, and the schedules for demonstrating compliance for existing sources under normal operation in Table 2 of section §63.2850. [40 CFR 63.2850(b)] Federally Enforceable Through Title V Permit
21. The permittee shall submit an initial notification no later than 120 days after the effective date of this subpart. The notification shall include: 1) The name and address of the owner or operator; 2) The physical address of the vegetable oil production process; 3) Identification of the relevant standard, such as the vegetable oil production NESHAP, and compliance date; 4) A brief description of the source including the types of listed oilseeds processed, nominal operating capacity, and type of desolventizer(s) used; and 5) A statement designating the source as a major source of HAP. [40 CFR 63.2850(a)(1)(i)] Federally Enforceable Through Title V Permit
22. The permittee must submit a notification of compliance status report to the responsible agency no later than 60 days after determining the initial 12 operating months compliance ratio. This notification shall be submitted no later than 50 calendar months after the effective date of this subpart. The notification of compliance status must contain the items in 40 CFR section §63.2860(d)(1) - (6). [40 CFR 63.2850(a)(1)(iv)] Federally Enforceable Through Title V Permit
23. The permittee must develop and implement a written plan for demonstrating compliance that provides detailed procedures to monitor and record data necessary for demonstrating compliance with 40 CFR 63 Subpart GGGG. If any changes to the plan for demonstrating compliance are made, the permittee must keep all previous versions of the plan and make them readily available for inspection at least 5 years after each revision. The plan for demonstrating compliance must include the items in 40 CFR section §63.2851(a)(1) - (7). [40 CFR 63.2850(a)(2)] Federally Enforceable Through Title V Permit
24. The permittee must develop a written SSM (Startup, Shutdown, and Malfunction) plan in accordance with 40 CFR 63.6(e)(3) and implement the plan, when applicable. The SSM plan must be completed before the compliance date of the existing source providing detailed procedures for operating and maintaining the source to minimize emissions during a qualifying SSM event for which the source chooses the Sec. §63.2850(e)(2) malfunction period, or the Sec. §63.2850(c)(2) or (d)(2) initial startup period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. [40 CFR 63.2850(a)(3)] Federally Enforceable Through Title V Permit
25. The recordkeeping requirements of section §63.2862 must be satisfied by the compliance date, if the source processes any listed oilseed, as defined in 40 CFR section §63.2872. The permittee shall record all the items listed in 40 CFR 63.2862(c)(1)-(3). [40 CFR 63.2850(a)(4)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. The permittee shall record the following items by the end of the calendar month following each operating month: 1) The 12 operating months rolling sum of the actual solvent loss in gallons as described in 40 CFR 63.2853(c); 2) The weighted average volume fraction of HAP in extraction solvent received for the previous 12 operating months as described in 40 CFR 63.2854(b)(3); 3) The 12 operating months rolling sum of each type of listed oilseed processed at the affected source in tons as described in 40 CFR 63.2855(c); 4) A determination of the compliance ratio. Using the values from 40 CFR 63.2853, 63.2854, 63.2855, and Table 1 of Section §63.2840, calculate the compliance ratio using Equation 2 of Sec. §63.2840; and 5) A statement of whether the source is in compliance with all of the requirements of this subpart. [40 CFR 63.2850(a)(4)] Federally Enforceable Through Title V Permit
27. For each SSM event subject to an initial startup period as described in Section §63.2850(c)(2) or (d)(2), or a malfunction period as described in Section §63.2850(e)(2), the permittee shall record the following items by the end of the calendar month following each month in which the initial startup period or malfunction period occurred: 1) A description and date of the SSM event, its duration, and reason it qualifies as an initial startup or malfunction; 2) An estimate of the solvent loss in gallons for the duration of the initial startup or malfunction period with supporting documentation; and 3) A checklist or other mechanism to indicate whether the SSM plan was followed during the initial startup or malfunction period. [40 CFR 63.2850(a)(4)] Federally Enforceable Through Title V Permit
28. Annual compliance certifications must be submitted 12 calendar months after submission of the initial notification of compliance status. Each subsequent annual compliance certification is due 12 calendar months after the previous annual compliance certification. The annual compliance certification provides the compliance status for each operating month during the 12 calendar months period ending 60 days prior to the date on which the report is due and includes the information in 40 CFR 63.2861(a)(1) - (6). [40 CFR 63.2850(a)(5)(i)] Federally Enforceable Through Title V Permit
29. Deviation notification report shall be submitted for each compliance determination made in which the compliance ratio exceeds 1.00 as determined under 40 CFR 63.2840(c). The report shall be submitted by the end of the month following the calendar month in which the deviation occurred. The deviation notification report must include the items in 40 CFR 63.2861(b)(1) - (4). [40 CFR 63.2861(b)(1)-(4)] Federally Enforceable Through Title V Permit
30. A periodic SSM report shall be submitted by the end of the calendar month following each month in which the initial startup period or malfunction period occurred. The periodic SSM report must include: 1) The name, title, and signature of a source's responsible official certifying that the report accurately states that all actions taken during the initial startup or malfunction period were consistent with the SSM plan; 2) A description of events occurring during the time period, the date and duration of the events, and reason the time interval qualifies as an initial startup period or malfunction period; and 3) An estimate of the solvent loss during the initial startup or malfunction period with supporting documentation. [40 CFR 63.2850(a)(5)(ii)] Federally Enforceable Through Title V Permit
31. If the source handle a SSM during an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2) differently from procedures in the SSM plan and the relevant emission requirements in 40 CFR 63.2840 are exceeded, then the permittee must submit an immediate SSM report consisting of a telephone call or facsimile transmission to the responsible agency within 2 working days after starting actions inconsistent with the SSM plan, followed by a letter within 7 working days after the end of the event. The letter must include the items listed in 40 CFR 63.2861(d)(1) - (3). [40 CFR 63.2850(a)(5)(iii)] Federally Enforceable Through Title V Permit
32. If the source experiences an unscheduled shutdown as a result of a malfunction, as defined in 40 CFR §63.2, continues to operate during a malfunction (including the period reasonably necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, the permittee must choose to comply with one of the options listed in 40 CFR section §63.2850(e)(1)-(2) within 15 days of the beginning date of the malfunction. [40 CFR 63.2850(e)] Federally Enforceable Through Title V Permit
33. At the time of each annual source test for VOC, the permittee shall establish the temperature ranges of the outlet gas from the vent condenser, the temperature ranges of the inlet oil to the mineral oil scrubber (MOS), and the temperature ranges of the inlet oil to the mineral oil stripper. Minimum and maximum readings for each parameter shall be established during the annual source test. [40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

34. Every fifteen minute of operation, the permittee shall record the temperature readings and compare the readings with the acceptable range established during the most recent annual source test. Upon detecting any excursion from the acceptable range of readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
35. The owner or operator shall operate a monitoring system which is capable of monitoring and recording the mineral oil flowrate, in gallons per minute, through the mineral oil scrubber once every fifteen minutes. The mineral oil flowrate shall be maintained between 8 and 20 gallons per minute. Upon detecting any excursion from the acceptable range of readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Devices used to measure temperatures and mineral oil flowrates shall be maintained in accordance with the manufacturer's specifications. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
39. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
40. Permittee shall submit initial and actual startup notifications for replacing desolventizer/toaster unit as described in paragraphs (c)(1) and (2) of 40 CFR 63.2860(c). [40 CFR 63.2860(c)] Federally Enforceable Through Title V Permit

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

Attachment B: Certificate of Conformity

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

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

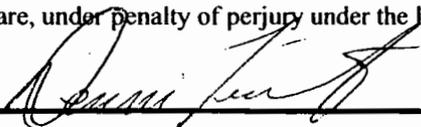
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: J.G. BOSWELL COMPANY	FACILITY ID: C-1555
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:	
3. Agent to the Owner:	

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

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

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



Signature of Responsible Official

12/22/2010
Date

Dennis Tristao

Name of Responsible Official (please print)

Environmental Services Manager

Title of Responsible Official (please print)

Attachment C: Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-1555-7-10

LEGAL OWNER OR OPERATOR: J G BOSWELL COMPANY OIL MILL

MAILING ADDRESS: PO BOX 457
CORCORAN, CA 93212

LOCATION: 710 BAINUM AVE
CORCORAN, CA 93212

EQUIPMENT DESCRIPTION:

MODIFICATION OF 2,120 HP PREPARATION PROCESS UNIT WITH 126" CROWN IRON WORKS REDUCER, EXPANDERS, TWO (2) ROSKAMP 28X52 FLAKING MILLS, ONE (1) FERREL ROSS 24X48 HYD FLAKING MILL, ONE (1) KRUPPS EXPELLER, AND MECHANICAL AND PNEUMATIC TRANSFER SYSTEMS SERVED BY THREE (3) 36" 1D-3D CYCLONE COLLECTORS: ADD TWO BAG DUMPING UNITS AND ASSOCIATED EQUIPMENT RELOCATED FROM PERMIT C-1555-8 CONSISTING OF TWO 2 HP CLAY BAG BREAKERS, TWO 15 HP OIL PUMPS, AND ONE 3 HP SLURRY TANK, ADD ONE HEAT EXCHANGER, ADD ONE 5 HP SEED BLEACHER, AND ADD ONE 7.5 HP VACUUM PUMP

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

DRAFT

DAVID WARNER, Director of Permit Services

C-1555-7-10: Jan 25 2011 5:43PM -- TOMS : Joint Inspection NOT Required

6. Visible emissions from sock filter(s) serving the bag dumping units shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule]
7. The maximum daily throughput of conditioned seed shall not exceed 1,400 ton/day when the mechanical conveyor system is used. [District NSR Rule] Federally Enforceable Through Title V Permit
8. In the event of a breakdown of the expeller conveyor system, the operator shall use the pneumatic conveyor backup system, and the District shall be notified immediately. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The maximum throughput of conditioned seed shall not exceed 420 tons per day when the pneumatic conveyor backup system is used. [District NSR Rule] Federally Enforceable Through Title V Permit
10. PM10 emissions from the preparation process unit shall not exceed 1.2 lb PM10/day. [District NSR Rule; District Rule 4202] Federally Enforceable Through Title V Permit
11. The maximum amount of material processed by the bag dumping units shall not exceed 1,500 lb/day. [District NSR Rule]
12. PM10 emissions from the bag dumping units shall not exceed 0.0568 lb/ton material processed. [District NSR Rule]
13. The particulate matter emissions shall comply with District Rule 4202, section 4.0 (12/17/92). [District Rule 4202] Federally Enforceable Through Title V Permit
14. Compliance with the above conditions shall be considered compliance with District Rules 4201 (12/17/92) and 4202 (12/17/92). Therefore, a permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
15. Dust collectors shall be inspected at least once every week while in operation for any cracks, holes, or malfunctions which might decrease the PM collection efficiency, and shall be repaired or replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and initials of the personnel performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Record of daily conditioned seed throughput for the preparation process unit and daily amount of material processed by the bag dumping units shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070; District Rule 2520, 9.4.2]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-1555-8-11

LEGAL OWNER OR OPERATOR: J G BOSWELL COMPANY OIL MILL
MAILING ADDRESS: PO BOX 457
CORCORAN, CA 93212

LOCATION: 710 BAINUM AVE
CORCORAN, CA 93212

EQUIPMENT DESCRIPTION:

MODIFICATION OF 750 HP VEGETABLE OIL SOLVENT PLANT/REFINERY WITH CROWN IRON WORKS COMPANY EQUIPMENT INCLUDING A CROWN SERIES 900 EXTRACTOR, EVAPORATORS, A DESOLVENTIZER/TOASTER, ASSOCIATED EQUIPMENT SERVED BY THREE 30" 2D-2D CYCLONES AND TWO 6500 GALLONS SKIMMER/AERATION TANKS, ONE 10,000 GALLONS WASTE WATER STORAGE TANK, FOUR SUMPS, AND ONE 30,000 GALLONS EQUALIZATION TANK: REMOVE TWO BAG DUMPING UNITS AND ASSOCIATED EQUIPMENT RELOCATED TO PERMIT C-1555-7 CONSISTING OF TWO 2 HP CLAY BAG BREAKERS, TWO 15 HP OIL PUMPS, AND ONE 3 HP SLURRY TANK

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Visible emissions from sock filter(s) serving the bag dumping unit shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

DRAFT

DAVID WARNER, Director of Permit Services

C-1555-8-11 Jan 25 2011 5:43PM - TOMS Joint Inspection NOT Required

6. The maximum amount of material processed by the bag dumping unit shall not exceed 750 lb/day. [District NSR Rule]
7. PM10 emissions from the bag dumping unit shall not exceed 0.0568 lb/ton material processed. [District NSR Rule]
8. The Owner/Operator shall control the amount of fresh hexane so that the average rate over a three month period does not exceed 2,156 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Record of daily amount of material processed by the bag dumping unit shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070]
10. The Owner/Operator shall maintain records such that daily vegetable oil seed material processing rates and hexane consumption can be determined. [District NSR Rule; District Rule 2520, 9.4.2; District Rule 4691, 6.1] Federally Enforceable Through Title V Permit
11. All vapors and gas streams from the extractor, wastewater reboiler, solvent-water separator, and dryer/toaster condenser shall be routed to the vent condenser and then to the mineral scrubber. [District NSR Rule; District Rule 4691, 5.2; Kings County Rule 410] Federally Enforceable Through Title V Permit
12. The condenser and mineral oil scrubber shall have a combined capture and control efficiency of at least 95 percent by weight. [District Rule 4691, 5.1; Kings County Rule 410] Federally Enforceable Through Title V Permit
13. The permittee shall conduct inspections at least once a month on all equipment in organic service for any indication of any leak of VOCs. Monthly inspections shall be done in accordance with EPA Method 21. [District Rule 4691, 5.3] Federally Enforceable Through Title V Permit
14. If a detected leakage level exceeds 10,000 ppm, or if leaks are visible, the leaking equipment shall be repaired within ten (10) days. [District Rule 4691, 5.3] Federally Enforceable Through Title V Permit
15. The owner/operator shall not use any equipment in organic service at the vegetable oil plant unless such equipment does not leak. [District Rule 4691, 5.4] Federally Enforceable Through Title V Permit
16. Emissions from leaks in equipment in organic service which have been tagged by the owner or operator for repair in accordance with the requirements of Section 6.1 of Rule 4691 (12/17/92) or which have been repaired and are waiting reinspection shall not constitute a violation of Section 5.4 of Rule 4691 (12/17/92). [District Rule 4691, 5.5] Federally Enforceable Through Title V Permit
17. The owner/operator shall comply with all the recordkeeping and monitoring requirements of section 6.0 of Rule 4691 (12/17/97). [District Rule 4691, 6.0] Federally Enforceable Through Title V Permit
18. The owner/operator shall check the oil temperature at various points. The oil from the heater shall be between 230 F and 255 F. The oil from the cooler shall be less than 100 F. [District Rule 4691, 5.1; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. The extractor shall run under a vacuum of at least 0.1 inches of water. [District Rule 4691, 5.1; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. Compliance with the above conditions shall be considered compliance with District Rules 4201 (12/17/92), 4202 (12/17/92), and 4691 (12/17/92). Therefore, a permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Dust collectors shall be inspected at least once every week while in operation for any cracks, holes, or malfunctions which might decrease the PM collection efficiency, and shall be repaired or replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and initials of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. The owner/operator shall perform EPA Method 18 on an annual basis to determine compliance with District Rule 4691 (12/17/92). [District Rule 4691; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. On and after compliance date, for each operating month, the permittee must calculate the compliance ratio in accordance with methods and procedures specified in 40 CFR 63.2840 (a), (b), and (d). The compliance ratio shall not exceed 1.0. [40 CFR 63.2840] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. The permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of section §63.2850 for sources under normal operation, and the schedules for demonstrating compliance for existing sources under normal operation in Table 2 of section §63.2850. [40 CFR 63.2850(b)] Federally Enforceable Through Title V Permit
26. The permittee shall submit an initial notification no later than 120 days after the effective date of this subpart. The notification shall include: 1) The name and address of the owner or operator; 2) The physical address of the vegetable oil production process; 3) Identification of the relevant standard, such as the vegetable oil production NESHAP, and compliance date; 4) A brief description of the source including the types of listed oilseeds processed, nominal operating capacity, and type of desolventizer(s) used; and 5) A statement designating the source as a major source of HAP. [40 CFR 63.2850(a)(1)(i)] Federally Enforceable Through Title V Permit
27. The permittee must submit a notification of compliance status report to the responsible agency no later than 60 days after determining the initial 12 operating months compliance ratio. This notification shall be submitted no later than 50 calendar months after the effective date of this subpart. The notification of compliance status must contain the items in 40 CFR section §63.2860(d)(1) - (6). [40 CFR 63.2850(a)(1)(iv)] Federally Enforceable Through Title V Permit
28. The permittee must develop and implement a written plan for demonstrating compliance that provides detailed procedures to monitor and record data necessary for demonstrating compliance with 40 CFR 63 Subpart GGGG. If any changes to the plan for demonstrating compliance are made, the permittee must keep all previous versions of the plan and make them readily available for inspection at least 5 years after each revision. The plan for demonstrating compliance must include the items in 40 CFR section §63.2851(a)(1) - (7). [40 CFR 63.2850(a)(2)] Federally Enforceable Through Title V Permit
29. The permittee must develop a written SSM (Startup, Shutdown, and Malfunction) plan in accordance with 40 CFR 63.6(e)(3) and implement the plan, when applicable. The SSM plan must be completed before the compliance date of the existing source providing detailed procedures for operating and maintaining the source to minimize emissions during a qualifying SSM event for which the source chooses the Sec. §63.2850(e)(2) malfunction period, or the Sec. §63.2850(c)(2) or (d)(2) initial startup period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. [40 CFR 63.2850(a)(3)] Federally Enforceable Through Title V Permit
30. The recordkeeping requirements of section §63.2862 must be satisfied by the compliance date, if the source processes any listed oilseed, as defined in 40 CFR section §63.2872. The permittee shall record all the items listed in 40 CFR 63.2862(c)(1)-(3). [40 CFR 63.2850(a)(4)] Federally Enforceable Through Title V Permit
31. The permittee shall record the following items by the end of the calendar month following each operating month: 1) The 12 operating months rolling sum of the actual solvent loss in gallons as described in 40 CFR 63.2853(c); 2) The weighted average volume fraction of HAP in extraction solvent received for the previous 12 operating months as described in 40 CFR 63.2854(b)(3); 3) The 12 operating months rolling sum of each type of listed oilseed processed at the affected source in tons as described in 40 CFR 63.2855(c); 4) A determination of the compliance ratio. Using the values from 40 CFR 63.2853, 63.2854, 63.2855, and Table 1 of Section §63.2840, calculate the compliance ratio using Equation 2 of Sec. §63.2840; and 5) A statement of whether the source is in compliance with all of the requirements of this subpart. [40 CFR 63.2850(a)(4)] Federally Enforceable Through Title V Permit
32. For each SSM event subject to an initial startup period as described in Section §63.2850(c)(2) or (d)(2), or a malfunction period as described in Section §63.2850(e)(2), the permittee shall record the following items by the end of the calendar month following each month in which the initial startup period or malfunction period occurred: 1) A description and date of the SSM event, its duration, and reason it qualifies as an initial startup or malfunction; 2) An estimate of the solvent loss in gallons for the duration of the initial startup or malfunction period with supporting documentation; and 3) A checklist or other mechanism to indicate whether the SSM plan was followed during the initial startup or malfunction period. [40 CFR 63.2850(a)(4)] Federally Enforceable Through Title V Permit
33. Annual compliance certifications must be submitted 12 calendar months after submission of the initial notification of compliance status. Each subsequent annual compliance certification is due 12 calendar months after the previous annual compliance certification. The annual compliance certification provides the compliance status for each operating month during the 12 calendar months period ending 60 days prior to the date on which the report is due and includes the information in 40 CFR 63.2861(a)(1) - (6). [40 CFR 63.2850(a)(5)(i)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

34. Deviation notification report shall be submitted for each compliance determination made in which the compliance ratio exceeds 1.00 as determined under 40 CFR 63.2840(c). The report shall be submitted by the end of the month following the calendar month in which the deviation occurred. The deviation notification report must include the items in 40 CFR 63.2861(b)(1) - (4). [40 CFR 63.2861(b)(1)-(4)] Federally Enforceable Through Title V Permit
35. A periodic SSM report shall be submitted by the end of the calendar month following each month in which the initial startup period or malfunction period occurred. The periodic SSM report must include: 1) The name, title, and signature of a source's responsible official certifying that the report accurately states that all actions taken during the initial startup or malfunction period were consistent with the SSM plan; 2) A description of events occurring during the time period, the date and duration of the events, and reason the time interval qualifies as an initial startup period or malfunction period; and 3) An estimate of the solvent loss during the initial startup or malfunction period with supporting documentation. [40 CFR 63.2850(a)(5)(ii)] Federally Enforceable Through Title V Permit
36. If the source handle a SSM during an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2) differently from procedures in the SSM plan and the relevant emission requirements in 40 CFR 63.2840 are exceeded, then the permittee must submit an immediate SSM report consisting of a telephone call or facsimile transmission to the responsible agency within 2 working days after starting actions inconsistent with the SSM plan, followed by a letter within 7 working days after the end of the event. The letter must include the items listed in 40 CFR 63.2861(d)(1) - (3). [40 CFR 63.2850(a)(5)(iii)] Federally Enforceable Through Title V Permit
37. If the source experiences an unscheduled shutdown as a result of a malfunction, as defined in 40 CFR §63.2, continues to operate during a malfunction (including the period reasonably necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, the permittee must choose to comply with one of the options listed in 40 CFR section §63.2850(e)(1)-(2) within 15 days of the beginning date of the malfunction. [40 CFR 63.2850(e)] Federally Enforceable Through Title V Permit
38. At the time of each annual source test for VOC, the permittee shall establish the temperature ranges of the outlet gas from the vent condenser, the temperature ranges of the inlet oil to the mineral oil scrubber (MOS), and the temperature ranges of the inlet oil to the mineral oil stripper. Minimum and maximum readings for each parameter shall be established during the annual source test. [40 CFR Part 64] Federally Enforceable Through Title V Permit
39. Every fifteen minute of operation, the permittee shall record the temperature readings and compare the readings with the acceptable range established during the most recent annual source test. Upon detecting any excursion from the acceptable range of readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
40. The owner or operator shall operate a monitoring system which is capable of monitoring and recording the mineral oil flowrate, in gallons per minute, through the mineral oil scrubber once every fifteen minutes. The mineral oil flowrate shall be maintained between 8 and 20 gallons per minute. Upon detecting any excursion from the acceptable range of readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
41. Devices used to measure temperatures and mineral oil flowrates shall be maintained in accordance with the manufacturer's specifications. [40 CFR Part 64] Federally Enforceable Through Title V Permit
42. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
43. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
44. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
45. Permittee shall submit initial and actual startup notifications for replacing desolventizer/toaster unit as described in paragraphs (c)(1) and (2) of 40 CFR 63.2860(a). [40 CFR 63.2860(c)] Federally Enforceable Through Title V Permit

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