



SEP 30 2011

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

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-1346
Project # S-1113891**

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for California Dairies Inc, located at 11894 Avenue 120, Tipton, 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. California Dairies is proposing to replace the Rodgers powder milk dryer's existing 30 MMBtu/hr "Maxon" burner with a 30 MMBtu/hr "Maxon Crossfire" low NOx burner.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # S-1346-4-11 with Certificate of Conformity. After demonstrating compliance with the Authority 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: Steve Davidson, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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34946 Flyover Court
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SEP 30 2011

Sy Dang Le
California Dairies Inc
PO Box 387
Tipton, CA

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-1346
Project # S-1113891**

Dear Mr. Le:

Enclosed for your review is the District's analysis of your application for Authority 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. California Dairies is proposing to replace the Rodgers powder milk dryer's existing 30 MMBtu/hr "Maxon" burner with a 30 MMBtu/hr "Maxon Crossfire" low NOx burner.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority 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: Steve Davidson, Permit Services

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San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review
Natural Gas-Fired Dryer
(Burner Replacement)

Facility Name:	California Dairies Inc.	Date:	September 21, 2011
Mailing Address:	PO Box 387	Engineer:	Steve Davidson
	Tipton, CA 93272	Lead Engineer:	Richard Karrs
Contact Person:	Sy Dang Le		
Telephone:	559-233-5154 ext. 119		
Application #(s):	S-1346-4-11		
Project #:	S-1113891		
Deemed Complete:	September 12, 2011		

I. Proposal

California Dairies Inc. (CDI) is applying for an Authority to Construct (ATC) to replace the existing 30 MMBtu/hr "Maxon" burner of the existing Rodgers powder milk dryer (S-1346-4-11) with a "Maxon Crossfire" low NOx burner. The burner replacement will result in an improved product quality. An increase in emissions is not proposed or expected as a result of this project.

CDI received their Title V Permit on March 2, 2010. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, 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. California Dairies 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)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4309	Dryers, Dehydrators, and Ovens (12/15/05)
Rule 4801	Sulfur Compounds (12/17/92)
40 CFR Part 64	Compliance Assurance Monitoring (10/22/97)
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 California Dairies Inc. Tipton facility is located at 11894 Avenue 120 in Tipton, CA. The District has verified that 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 Tipton facility is used for milk processing. The milk dryer (S-1346-4) is operated for the production of powdered dry milk products. Liquid milk is concentrated by evaporation. Then the hot concentrate is pumped under pressure to an atomizing nozzle, which is in a moving current of hot air in the dryer chamber. The dried milk falls to the bottom of the dryer for removal. The hot air used for drying is heated by natural gas and/or steam. After drying the milk product, the air is filtered and exhausted.

V. Equipment Listing

Pre-Project Equipment Description:

S-1346-4-9: 30 MMBTU/HR CE ROGERS NATURAL GAS-FIRED VERTICAL SPRAY MILK DRYER MODEL VRS13000 WITH "MAXON" LOW-NOX BURNER, CE ROGERS BAGHOUSE, AND CE ROGERS ENCLOSED SCREEN SIFTER WITH "DEAD-END" BAGHOUSE

Proposed Modification:

Replace the existing 30 MMBtu/hr "Maxon" low-NOx burner with a 30 MMBtu/hr "Maxon Crossfire" low-NOx burner.

S-1346-4-10: MODIFICATION OF 30 MMBTU/HR CE ROGERS NATURAL GAS-FIRED VERTICAL SPRAY MILK DRYER MODEL VRS13000 WITH "MAXON" LOW-NOX BURNER, CE ROGERS BAGHOUSE, AND CE ROGERS ENCLOSED SCREEN SIFTER WITH "DEAD-END" BAGHOUSE: REPLACE THE 30 MMBTU/HR "MAXON" LOW-NOX BURNER WITH A 30 MMBTU/HR "MAXON CROSSFIRE" LOW-NOX BURNER

Post Project Equipment Description:

S-1346-4-10: 30 MMBTU/HR CE ROGERS NATURAL GAS-FIRED VERTICAL SPRAY MILK DRYER MODEL VRS13000 WITH "MAXON" LOW-NOX BURNER, CE ROGERS BAGHOUSE, AND CE ROGERS ENCLOSED SCREEN SIFTER WITH "DEAD-END" BAGHOUSE

VI. Emission Control Technology Evaluation

Low-NOx burners reduce NOx formation by producing lower flame temperatures (and longer flames) than conventional burners. Conventional burners thoroughly mix all the fuel and air in a single stage just prior to combustion, whereas low-NOx burners delay the mixing of fuel and air by introducing the fuel (or sometimes the air) in multiple stages.

VII. General Calculations

- The maximum operating schedule is 24 hours per day and 365 days per year
- Input heating value = 30 MMBtu/hr
- Fuel usage shall not exceed 686 MMBtu/day, 35,000 MMBtu/qtr, or 140,000 MMBtu/yr (Current PTO limit)
- Process throughput = 150 ton/day; (Current PTO limit)
- Per applicant, no change in emission limits, fuel usage, or product throughput is proposed for the dryers.

B. Emission Factors

S-1346-4:

Pollutant	Project Emission Factors – Natural Gas	Source
NO _x	3.7 ppmvd (@ stack conditions) /0.065 lb/MMBtu	Current PTO
SO _x	0.001 lb-SO _x /MMBtu	Current PTO
PM ₁₀	0.182 lb-PM10/ton powder	Current PTO
CO	30 ppmvd (@ stack conditions) /0.4434 lb/MMBtu	Current PTO
VOC	0.003 lb-VOC/MMBtu	Current PTO

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Pre-Project Daily Emissions							
NO _x	0.065	(lb/MMBtu) x	686	(MMBtu/day)	=	44.6	(lb/day)
SO _x	0.001	(lb/MMBtu) x	686	(MMBtu/day)	=	0.7	(lb/day)
PM ₁₀	0.182	(lb/MMBtu) x	150	(ton/day)	=	27.3	(lb/day)
CO	0.4434	(lb/MMBtu) x	686	(MMBtu/day)	=	304.2	(lb/day)
VOC	0.003	(lb/MMBtu) x	686	(MMBtu/day)	=	2.1	(lb/day)

Pre-Project Annual Emissions							
NO _x	0.065	(lb/MMBtu) x	140,000	(MMBtu/yr)	=	9100	(lb/yr)
SO _x	0.001	(lb/MMBtu) x	140,000	(MMBtu/yr)	=	140	(lb/yr)
PM ₁₀	0.182	(lb/MMBtu) x	54,750	(ton/year)	=	9965	(lb/yr)
CO	0.4434	(lb/MMBtu) x	140,000	(MMBtu/yr)	=	62,076	(lb/yr)
VOC	0.003	(lb/MMBtu) x	140,000	(MMBtu/yr)	=	420	(lb/yr)

2. Post Project Potential to Emit (PE2)

Post Project Daily Emissions							
NO _x	0.065	(lb/MMBtu) x	686	(MMBtu/day)	=	44.6	(lb/day)
SO _x	0.001	(lb/MMBtu) x	686	(MMBtu/day)	=	0.7	(lb/day)
PM ₁₀	0.182	(lb/MMBtu) x	150	(ton/day)	=	27.3	(lb/day)
CO	0.4434	(lb/MMBtu) x	686	(MMBtu/day)	=	304.2	(lb/day)
VOC	0.003	(lb/MMBtu) x	686	(MMBtu/day)	=	2.1	(lb/day)

Post Project Annual Emissions							
NO _x	0.065	(lb/MMBtu) x	140,000	(MMBtu/yr)	=	9100	(lb/yr)
SO _x	0.001	(lb/MMBtu) x	140,000	(MMBtu/yr)	=	140	(lb/yr)
PM ₁₀	0.182	(lb/MMBtu) x	54,750	(ton/year)	=	9965	(lb/yr)
CO	0.4434	(lb/MMBtu) x	140,000	(MMBtu/yr)	=	62,076	(lb/yr)
VOC	0.003	(lb/MMBtu) x	140,000	(MMBtu/yr)	=	420	(lb/yr)

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.

The total Pre-Project Stationary Source Potential to Emit (SSPE1_{total}) can be calculated by adding the Pre-Project Potential to Emit (PE1) from all units with valid ATCs or PTOs (SSPE1_{Permit Unit}) and the sum of the ERCs that have been banked at the source and which have not been used on-site (Total_{ERC}).

$$SSPE1_{Total} = SSPE1_{Permit Unit} + Total_{ERC}$$

Pre-Project Stationary Source Potential to Emit [SSPE1 (lb/year)]					
Permit Unit	NO_x	SO_x	PM₁₀	CO	VOC
ATC S-1346-1-12*	544	43	45	2570	45
ATC S-1346-2-9*	544	43	45	2570	45
ATC S-1346-3-11*	544	43	45	2570	45
PTO S-1346-4-9	9,100	140	9,965	62,076	420
PTO S-1346-14-4	7,008	105	9,401	28,032	526
PTO S-1346-18-5	2,208	786	2,097	20,420	1,518
PTO S-1346-19-5	2,208	786	2,097	20,420	1,518
PTO S-1346-20-3	574	13	33	116	83
PTO S-1346-21-3	714	18	6	10	13
PTO S-1346-22-3	714	18	6	10	13
PTO S-1346-23-3	53	2	1	4	2
PTO S-1346-24-2	7,897	2,322	17,108	19,393	2,812
Pre-Project SSPE (SSPE1)	31,564	5,238	40,804	155,621	6,995

* Only two (any two) of the three units will operate at the same time

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
ATC S-1346-1-12*	544	43	45	2570	45
ATC S-1346-2-9*	544	43	45	2570	45
ATC S-1346-3-11*	544	43	45	2570	45
PTO S-1346-4-9	9,100	140	9,965	62,076	420
PTO S-1346-14-4	7,008	105	9,401	28,032	526
PTO S-1346-18-5	2,208	786	2,097	20,420	1,518
PTO S-1346-19-5	2,208	786	2,097	20,420	1,518
PTO S-1346-20-3	574	13	33	116	83
PTO S-1346-21-3	714	18	6	10	13
PTO S-1346-22-3	714	18	6	10	13
PTO S-1346-23-3	53	2	1	4	2
PTO S-1346-24-2	7,897	2,322	17,108	19,393	2,812
Post- Project SSPE (SSPE2)	31,564	5,238	40,804	155,621	6,995

* Only two (any two) of the three units will operate at the same time

5. Major Source Determination

Pursuant to Section 3.23 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 3.23.2 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	PM ₁₀	CO	VOC
Pre-Project SSPE (SSPE1)	31,564	5,238	40,804	155,621	6,995
Post Project SSPE (SSPE2)	31,564	5,238	40,804	155,621	6,995
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	No	No

As seen in the table above, the facility is an existing Major Source for NO_x emissions and will remain Major Source for NO_x emissions. The facility will not become a Major Source for any other pollutant 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 SO_x, PM₁₀, CO, or VOC. Therefore, Baseline Emissions (BE) for SO_x, PM₁₀, CO, and VOC are equal to the Pre-Project Potential to Emit (PE1).

As calculated in Section VII.C.1 above, PE1 is summarized in the following table:

Baseline Emissions [BE] (lb/year)			
SO _x	PM ₁₀	CO	VOC
140	9965	62,076	420

As shown in Section VII.C.5 above, the facility is a major source for NO_x emissions.

Clean Emissions Unit, Located at a Major Source

Pursuant to Rule 2201, Section 3.12, 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 low NO_x burner fired on natural gas, which meets the requirements for achieved-in-practice BACT for BACT Guideline 1.6.11, Dryer – Milk Spray, > or = 20 MMBtu/hr. Therefore, Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

BE = PE1 = 9100 lb NO_x/year

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 a major source for NO_x, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO _x	9100	50,000	No

Since the SB 288 Major Modification Threshold was not surpassed with this project, this project does not constitute a SB288 Major Modification.

8. Federal Major Modification

District Rule 2201, Section 3.17 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Step 1

For existing emissions units, the increase in emissions is calculated as follows.

$$\text{Emission Increase} = \text{PAE} - \text{BAE} - \text{UBC}$$

Where: PAE = Projected Actual Emissions, and
BAE = Baseline Actual Emissions
UBC = Unused baseline capacity

If there is no increase in design capacity or potential to emit, the PAE is equal to the annual emission rate at which the unit is projected to emit in any one year, selected by the operator, within 5 years after the unit resumes normal operation. If detailed PAE are not provided, the PAE is equal to the PE2 for each permit unit.

The BAE is calculated based on historical emissions and operating records for any 24 month period, selected by the operator, within the previous 10 year period. The BAE must be adjusted to exclude any non-compliant operation emissions and emissions that are no longer allowed due to lower applicable emission limits that were in effect when this application was deemed complete.

UBC: Since this project does not result in an increase in design capacity or potential to emit, and it does not impact the ability of the emission unit to operate at a higher utilization rate, the UBC is the portion of PAE that the emission units could have accommodated during the baseline period.

$$\begin{aligned} \text{Emission Increase} &= \text{PAE} - \text{BAE} - \text{UBC} \\ \text{Emission Increase} &= \text{PAE} - (\text{BAE} + \text{UBC}) \\ \text{Emission Increase} &= 9100 \text{ lb-NO}_x \text{ /yr} - 9100 \text{ lb-NO}_x \text{ /yr} \\ \text{Emission Increase} &= 0 \text{ lb-NO}_x \text{ /yr} \end{aligned}$$

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)**	Thresholds (lb/yr)	Federal Major Modification?
NO _x	0	0	Yes/No

Since the Federal Major Modification Threshold is not being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

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. Detailed QNEC calculations are included in Appendix B.

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 exempted pursuant to Section 4.2, 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 SB288 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

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

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)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's Potential to Emit 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

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

$$\text{PE2} = 44.6 \text{ (lb/day)}$$

$$\text{PE1} = 44.6 \text{ (lb/day)}$$

$$\text{EF2} = 0.065 \text{ (lb/MMBtu)}$$

$$\text{EF1} = 0.065 \text{ (lb/MMBtu)}$$

$$\text{AIPE} = 44.6 \text{ lb/day} - (44.6 \text{ lb/day} * 0.065 \text{ lb/MMBtu} / 0.065 \text{ lb/MMBtu})$$

$$\text{AIPE} = 0.0 \text{ lb/day}$$

As demonstrated above, the AIPE is not greater than 2.0 lb/day for NO_x emissions; therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute a SB 288 and/or Federal Major Modification for NO_x emissions; therefore BACT is not triggered for any pollutant.

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)	31,564	5,238	40,804	155,621	6,995
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	No	No	No

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for NO_x and the SSPE2 is greater than the offset thresholds; therefore offset calculations will be required 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) = $(\sum[PE2 - BE] + ICCE) \times DOR$, 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 = 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)

As calculated in Section VII.C.6 above, the Baseline Emissions (BE) from this unit are equal to the Pre-Project Potential to Emit (PE1) since the unit is a Clean Emissions Unit.

Also, there is only one emissions unit associated with this project and 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 (NO_x) = 9,100 lb/year
BE (NO_x) = 9,100 lb/year
ICCE = 0 lb/year

Offsets Required (lb/year) = $([9,100 - 9,100] + 0) \times DOR$
= 0 lb NO_x/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. New Major Sources, Federal Major Modifications, and SB288 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 SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Modifications, and SB288 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 and VII.C.8, this project does not constitute a 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 Potential to Emit 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 Potential to Emit Purposes.

c. Offset Threshold

The following table compares the SSPE1 with the SSPE2 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	31,564	31,564	20,000 lb/year	No
SO _x	5,238	5,238	54,750 lb/year	No
PM ₁₀	40,804	40,804	29,200 lb/year	No
CO	155,621	155,621	200,000 lb/year	No
VOC	6,995	6,995	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 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	31,564	31,564	0	20,000 lb/year	No
SO _x	5,238	5,238	0	20,000 lb/year	No
PM ₁₀	40,804	40,804	0	20,000 lb/year	No
CO	155,621	155,621	0	20,000 lb/year	No
VOC	6,995	6,995	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)

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.

The DELs are stated in the form of emission factors, the maximum daily fuel consumption, maximum daily throughput of powder, and the maximum operational time of 24 hours per day.

Proposed Rule 2201 (DEL) Conditions:

- Emission rates shall not exceed any of the following limits: SO_x (as SO₂): 0.001 lb/MMBTU, NO_x (as NO₂): 3.7 ppmv at stack conditions, VOC: 0.003 lb/MMBTU or CO: 30 ppmv at stack conditions. [District Rules 2201 and 4309] Y
- PM₁₀ emissions from the CE Rogers dryer baghouse shall not exceed 0.182 lb/ton of powder processed. [District Rule 2201 and 40 CFR part 64] Y
- Process weight rate shall not exceed 150 tons/day of powder. [District Rule 2201 and 40 CFR part 64] Y
- Fuel usage shall not exceed 686 MMBtu in any day and 35,000 MMBtu/qtr, or 140,000 MMBtu in a year. [District Rule 2201] Y

E. Compliance Assurance

1. Source Testing

Rule 4309 requires source testing for NO_x and CO within 60 days of initial operation and at least once every 24 months thereafter. Rule 4309 requires source testing of PM₁₀ at least once every 24 months. Therefore, source testing for Rule 4309 satisfies source testing requirements of Rule 2201. No additional source testing is required.

2. Monitoring

As required by District Rule 4309, the dryeroiler is subject to monitoring requirements. Monitoring requirements, in accordance with District Rules will be discussed in the District Rule 4309 compliance review section of this evaluation.

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) will appear on the permit to operate:

- Permittee shall maintain accurate records of daily fuel consumption, operating hours, and daily throughputs and shall make such records available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.3.2, 9.4.2 and 40 CFR part 64] Y

The applicant will also be required to keep records that are required by the Rules 2520, 4309 and 40 CFR part 64.

- The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520 and 4309] Y
- The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2520 and 4309] Y
- Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2 and 40 CFR part 64] Y
- The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Y

4. Reporting

No reporting is required for Rule 2201; however, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9

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 Title V administrative amendment/minor modification application.

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.

The dryers are fired on natural gas, which is a clean burning fuel with no expected visible emissions. Continued compliance with the requirements of this rule 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. In addition, the following condition appears 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.

Since the applicant is not proposing an increase in fuel usage or product throughput with this project, 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.

$$\text{PM Conc. (gr/scf)} = \frac{(27.3 \text{ lb/day}) \times (7,000 \text{ gr/lb})}{(67,129 \text{ scfm}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM₁₀ emission rate = 27.3 lb/day. Assuming 100% of PM is PM₁₀
Exhaust Gas Flow = 67,129 scfm

$$\text{PM Conc. (gr/scf)} = 0.002 \text{ gr/scf} < 0.1 \text{ gr/scf}$$

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

- {2414} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Y

Rule 4202 Particulate Matter Emission Rate

Rule 4202 establishes PM emission limits as a function of process weight rate in tons/hr. Gas and liquid fuels are excluded from the definition of process weight.

Maximum Allowable Emission Rate:

$$E_{\text{Max}} = 3.59 P^{0.62} \quad (P \leq 30 \text{ tons per hour})$$

Where: E = Emissions in pounds per hour
P = Process weight rate in tons per hour

$$P = 150 \text{ ton/day} = 6.25 \text{ ton/hr}$$

$$E \text{ max} = 3.59P^{0.62} = 3.59 (6.25)^{0.62} = 11.2 \text{ lb-PM/hr}$$

Assuming all permitted PM10 = PM

$$\text{PM10} = 11.2 \text{ lb/hr} \times 24 = 269 \text{ lb/day}$$

The permit limit is 27.3 lb PM10/day < 269 lb PM10/day

Therefore, continued compliance with the requirement of this rule is expected.

Rule 4309 Dryers, Dehydrators, and Ovens

The purpose of this rule is to limit emissions of oxides of nitrogen (NOx) and carbon monoxide (CO) from dryers, dehydrators, and ovens. This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 million British thermal units per hour (5.0 MMBtu/hr) or greater.

Dryer S-1346-4 is required to comply with the Table 1 NOx and CO limits of 5.3 ppmv NOx and 42 ppmv CO corrected to either 19% O₂, if the measured exhaust O₂ concentration is less than 19%, or uncorrected if the measured O₂ concentration is greater than 19%.

Section 5.0 – Requirements

Table 1- NO _x and CO Limits				
Process Description	NO _x Limit (in ppmv)		CO Limit (in ppmv)	
	Gaseous Fuel Fired	Liquid Fuel Fired	Gaseous Fuel Fired	Liquid Fuel Fired
Asphalt/Concrete Plants	4.3	12.0	42	64
Milk, Cheese, and Dairy Processing < 20 MMBtu/hr	3.5	3.5	42	42
Milk, Cheese, and Dairy Processing ≥ 20 MMBtu/hr	5.3	5.3	42	42
Other processes not described above	4.3	4.3	42	42

The applicant is proposing the following NOx and CO emissions limits:

3.7 ppmv NOx and 30 ppmv CO at stack conditions (>19% O₂).

The proposed emission limits meet the requirements (Milk, Cheese, and Dairy Processing ≥ 20 MMBtu/hr) shown in the above table.

Therefore, compliance with this section is expected.

Section 5.3 states that the applicable emission limits in Section 5.2 shall not apply during start-up or shutdown provided an operator complies with the requirements specified below.

The facility has not requested relaxed emission limit requirements for their unit during startup or shutdown, therefore this section does not apply to the unit in this project.

Section 5.4, Monitoring Requirements

Section 5.4.1 states that except for dehydrators, the operator of any unit subject to the applicable emission limits in Sections 4.3.2, or 5.2 shall monitor emissions using one of the techniques specified in Sections 5.4.1.1 or 5.4.1.2.

Section 5.4.1.1 states the first technique as the installation and maintenance of an APCO-approved CEMS for NO_x, and oxygen that meets the following requirements.

- 40 CFR Part 51, and
- 40 CFR Parts 60.7 and 60.13 (except subsection h), and
- 40 CFR Part 60 Appendix B (Performance Specifications), and
- 40 CFR Part 60 Appendix F (Quality Assurance Procedures), and
- The applicable provisions of District Rule 1080 (Stack Monitoring).
- The APCO shall only approve CEMS that meets the requirements of Sections 5.4.1.1.1 through 5.4.1.1.5 of this rule.

Section 5.4.1.2 states the second technique as the installation and maintenance of an alternate emissions monitoring method that meets the requirements of Sections 5.4.1.2.1 through 5.4.1.2.3 of this rule.

Section 5.4.1.2.1 states that the APCO shall not approve an alternative monitoring system unless it is documented that continued operation within ranges of specified emissions-related performance indicators or operational characteristics provides a reasonable assurance of compliance with applicable emission limits.

Section 5.4.1.2.2 states that the approved alternate emission monitoring system shall monitor operational characteristics necessary to assure compliance with the emission limit. Operational characteristics shall be one or more of the following:

- Periodic NO_x exhaust emission concentrations,
- Periodic exhaust oxygen concentration,
- Flow rate of reducing agent added to exhaust,
- Catalyst inlet and exhaust temperature,
- Catalyst inlet and exhaust oxygen concentration,
- Periodic flue gas recirculation rate,
- Other surrogate operating parameter(s) that demonstrate compliance with the emission limit.

Since the operation of the units subject to this rule are very similar to the operation of the units subject to the requirements of District Rules 4306, Boilers, Steam Generators, and Process Heaters – Phase 3, and 4320, Advanced Emissions Reduction Option for Boilers, Steam Generators, and Process Heaters, the pre-approved alternate monitoring plans in District Policy SSP-1105 will be considered approved alternate monitoring plans for District Rule 4309 compliance.

In order to satisfy the requirements of District Rule 4309, the applicant has proposed to use pre-approved alternate monitoring scheme A (pursuant to District Policy SSP-1105), which requires that monitoring of NO_x, CO, and O₂ exhaust concentrations shall be conducted at least once per month (in which a source test is not performed) using a portable analyzer. The following conditions will be incorporated into the permit in order to ensure compliance with the requirements of the proposed alternate monitoring plan:

- The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]
- If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
- All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
- The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer,

(4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]

Section 5.5, Compliance Determination

Section 5.5.1 states that all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the PTO.

Section 5.5.2 states that except for as provided in Section 5.5.3, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0.

The following condition will be added to the permit to assure compliance with Sections 5.5.1 and 5.5.2.

- All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]

Section 5.5.3 states that notwithstanding the requirements of Section 5.5.2, the APCO, ARB, and US EPA may approve a longer or shorter period before compliance determination, if an operator submits an application for a PTO condition which provides a justification for the requested duration.

Section 5.5.4 states that all CEMS emissions measurements shall be averaged over a period of 15 consecutive minutes to demonstrate compliance with the applicable emission limits of this rule. Any 15-consecutive-minute block average CEMS measurement exceeding the applicable emission limits of this rule shall constitute a violation of this rule.

The facility has not proposed to utilize a CEMS; therefore the requirements of this section are not applicable to the dryers in this project.

Section 5.5.5 states that for emissions monitoring pursuant to Section 5.4.1.2.2.1, emission readings shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15-consecutive-minute period.

The following condition will be added to the permit to assure compliance with this section.

- All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or

a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

Section 6.1, Recordkeeping

Section 6.1.1 states the recordkeeping requirements of a unit that uses CEMS to monitor emissions. Since the applicant has not proposed a CEMS to monitor emissions, the requirements of this section do not apply to the unit in this project.

Section 6.1.2 states that operators using an alternate emissions monitoring system shall maintain the following records on a periodic basis:

- Total hours of operation.
- Type and quantity of fuel used during operations.
- Measurement for each surrogate parameter.
- Range of allowed values for each surrogate parameter.
- The period for recordkeeping shall be specified in the PTO conditions.

Section 6.1.3 only applies to dehydrators; therefore this section is not applicable to the unit in this project.

Section 6.1.4 states that the operator of a unit subject to Section 5.2 and performing start-up or shutdown of that unit shall keep records of the duration of each start-up and each shutdown. The facility has not proposed start-up or shutdown emissions for the dryer in this operation; therefore the requirements of this section do not apply to the dryer in this project.

Section 6.1.5 states the recordkeeping requirements of an operator of any unit operated under the exemption of Section 4.3.

Since the applicant has not applied for the exemption in Section 4.3, the requirements in this section do not apply to the dryer in this project.

Section 6.1.6 states the records and manufacturer's specifications required by Sections 6.1.1 through 6.1.5 shall meet all of the following requirements.

- The records shall be maintained for five (5) calendar years,
- The records shall be made available on-site during normal business hours, and
- The records shall be submitted to the APCO upon request.

The following condition will be added to the permit to assure compliance with this section.

- 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 Rules 1070 and 4309]

Section 6.2, Test Methods

Section 6.2 lists the test methods required by the rule. In lieu of the test methods listed below the facility can utilize alternative APCO and US EPA approved test methods.

Pollutant	Units	Test Method Required
Fuel hhv	Fuel hhv shall be certified by third party fuel supplier or:	
	Liquid fuels	ASTM D 240-87 or D 2382-88
	Gaseous fuels	ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89
NO _x	ppmv	EPA Method 7E or ARB Method 100
CO	ppmv	EPA Method 10 or ARB Method 100
Stack Gas O ₂	%	EPA Method 3 or 3A, or ARB Method 100
Stack Gas Velocities	ft/min	EPA Method 2
Stack Gas Moisture Content	%	EPA Method 4

The following permit conditions will be listed on the permit as follows:

- NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
- CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
- Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]

Section 6.3, Compliance Demonstration

Section 6.3.2 states that each unit subject to the requirements in Sections 4.3, or 5.2 shall be initially source tested to determine compliance with the applicable emission limits not later than the applicable full compliance schedule specified in Section 7.0. Thereafter, each unit subject to Section 5.2 emission limits shall be source tested at least once every 24 months. Units subject to Section 5.2 and operating less than 50 days per calendar year shall follow the source test frequency prescribed in Section 6.3.3. The following condition will be added to the permit to assure compliance with this section.

- Source testing to measure NO_x and CO emissions from this unit when fired on natural gas shall be conducted within 60 days of initial start-up and at least once every 24 months thereafter. [District Rules 2201 and 4309]

Section 6.3.5 states that the APCO shall be notified according to the provisions of Rule 1081 (Source Sampling). The following conditions will be added to the permit to assure compliance with this section.

- {109} Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
- The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

Section 6.3.6 states that emissions source testing shall be conducted with the unit operating either at conditions representative of normal operations or conditions specified in the PTO. The requirements of this section will be satisfied by the condition listed in Sections 5.5.1 and 5.5.2 of this rule evaluation.

Section 6.3.7 states that all test results for NO_x and CO shall be reported in ppmv, corrected to dry stack conditions and adjusted using the oxygen correction factor. The following condition will be added to the permit to assure compliance with this section.

- All test results for NO_x and CO shall be reported in ppmv @ 19% O₂, corrected to dry stack conditions. [District Rule 4309]

Section 6.3.8 states that for the purpose of determining compliance with an applicable emission limit, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply.

Section 6.3.9 states that if two of the three runs specified by Section 6.3.8 individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the unit, even if the averaged emissions of all three runs is less than the applicable limit.

The requirements of Sections 6.3.8 and 6.3.9 will be satisfied by the condition listed in Section 5.5.6 of this rule evaluation.

Section 6.4 lists the source testing requirements for asphalt/concrete plants. Since this facility is not an asphalt or concrete plant, the requirements of this section do not apply to the dryer in this project.

District Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2% by volume calculated as SO₂, on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = \frac{nRT}{P}$$

With:

N = moles SO₂

T (Standard Temperature) = 60°F = 520°R

P (Standard Pressure) = 14.7 psi

R (Universal Gas Constant) = $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$

$$\frac{0.001 \text{ lb} - \text{SO}_x}{\text{MMBtu}} \times \frac{\text{MMBtu}}{8,578 \text{ dscf}} \times \frac{1 \text{ lb} \cdot \text{mol}}{64 \text{ lb}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times \frac{1,000,000 \cdot \text{parts}}{\text{million}} = 0.69 \frac{\text{parts}}{\text{million}}$$

$$\text{Sulfur Concentration} = 0.69 \frac{\text{parts}}{\text{million}} < 2,000 \text{ ppmv (or 0.2\%)}$$

Therefore, compliance with District Rule 4801 requirements is expected.

40 CFR Part 64 Compliance Assurance Monitoring

40 CFR Part 64 applies to a unit that satisfies all of the following criteria:

- The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;
- The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

The unit meets all the criteria of this regulation; therefore, the rule applies. Currently the unit is in compliance with regulation and the proposal should not bring the unit out of compliance. 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; 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.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, as the project does not propose an increase in fuel usage, product throughput, or change in stack parameters, the potential impacts to public health are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct S-1346-4-11 subject to the permit conditions on the attached draft Authority to Construct in **Appendix E**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1346-4-8	3020-02-H	30 MMBtu/hr	\$1030

Appendices

- A: Current PTO
- B: Quarterly Net Emissions Change
- C: Emission Profile
- D: Compliance Certification
- E: Draft ATC

APPENDIX A
Current PTO

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1346-4-9

EXPIRATION DATE: 07/31/2013

SECTION: SW17 TOWNSHIP: 22S RANGE: 25E

EQUIPMENT DESCRIPTION:

30 MMBTU/HR CE ROGERS NATURAL GAS-FIRED VERTICAL SPRAY MILK DRYER MODEL VRS13000 WITH "MAXON" LOW-NOX BURNER, CE ROGERS BAGHOUSE, AND CE ROGERS ENCLOSED SCREEN SIFTER WITH "DEAD-END" BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Dryer shall be fired on PUC-quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Emission rates shall not exceed any of the following limits: SO_x (as SO₂): 0.001 lb/MMBTU, NO_x (as NO₂): 3.7 ppmv at stack conditions, VOC: 0.003 lb/MMBTU or CO: 30 ppmv at stack conditions. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
3. Emissions for NO_x and CO shall be uncorrected if the measured oxygen exhaust concentration exceeds 19.0% by volume or shall be corrected to 19.0% by volume for units operating at measured O₂ concentrations of 19.0 % by volume or less. [District Rules 2520 and 4309] Federally Enforceable Through Title V Permit
4. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520 and 4309] Federally Enforceable Through Title V Permit
5. If either the NO_x or CO concentrations as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 2520 and 4309] Federally Enforceable Through Title V Permit
6. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 2520 and 4309] Federally Enforceable Through Title V Permit
7. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2520 and 4309] 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.

8. For emissions source testing performed pursuant to Section 6.3 of District Rule 4309, (adopted December 15, 2005), for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three (3) 30- consecutive-minute test runs shall apply. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 2520 and 4309, 5.5.6] Federally Enforceable Through Title V Permit
9. Visible emissions shall be less than 5% opacity except for 3 minutes in any one hour. [District NSR Rule and 40 CFR part 64] Federally Enforceable Through Title V Permit
10. PM10 emissions from the CE Rogers dryer baghouse shall not exceed 0.182 lb/ton of powder processed. [District NSR Rule and 40 CFR part 64] Federally Enforceable Through Title V Permit
11. Process weight rate shall not exceed 150 tons/day of powder. [District NSR Rule and 40 CFR part 64] Federally Enforceable Through Title V Permit
12. Fuel usage shall not exceed 686 MMBtu in any day and 35,000 MMBtu/qtr, or 140,000 MMBtu in a year. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Screened powder shall be pneumatically transported to storage silo receiving bin for filling storage silos (S-1346-6, '-7, '-8, '-15, '-16 & '-17). [District NSR Rule] Federally Enforceable Through Title V Permit
14. District witnessed source testing to measure PM10, NOx and CO emissions shall be conducted every 24 months. [District Rules 1081, 7.2, 2201, and 4309] Federally Enforceable Through Title V Permit
15. Permittee shall maintain accurate records of daily fuel consumption, operating hours, and daily throughputs and shall make such records available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.3.2, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
16. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081, 7.1 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. The following test methods shall be used: PM10 (lb/ton) - CARB 501 in combination with CARB 5 or EPA Method 8, NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, and stack gas oxygen - EPA Method 3 or 3A or ARB Method 100. [District Rules 1081, 5.0 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
19. Visible emissions from the baghouse shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that the baghouse is operated. 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, 9.3.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
20. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
22. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2 and 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.

23. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202, 4.1] Federally Enforceable Through Title V Permit
24. 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
25. 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
26. 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

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

APPENDIX B
Quarterly Net Emissions Change (QNEC)

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:

QNEC = PE2 - PE1, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.

PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.

PE1 = Pre-Project Potential to Emit 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 PE1 can be calculated as follows:

$$\begin{aligned} \text{PE2}_{\text{quarterly}} &= \text{PE2}_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 9965 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 2491 \text{ lb PM}_{10}/\text{qtr} \end{aligned}$$

$$\begin{aligned} \text{PE1}_{\text{quarterly}} &= \text{PE1}_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 9965 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 2491 \text{ lb PM}_{10}/\text{qtr} \end{aligned}$$

Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO _x	2275	2275	0
SO _x	35	35	0
PM ₁₀	2491	2491	0
CO	15,519	15,519	0
VOC	105	105	0

APPENDIX C

Emissions Profile

Permit #: S-1346-4-11	Last Updated
Facility: CALIFORNIA DAIRIES, INC.	09/21/2011 DAVIDSOS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	9100.0	140.0	9965.0	62076.0	420.0
Daily Emis. Limit (lb/Day)	44.6	0.7	27.3	304.2	2.1
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:					

APPENDIX D
Compliance Certification

**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-1346
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:	

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

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the source 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

8/25/2011

Date

Sy Dang Le

Name of Responsible Official (please print)

Director of Environmental Compliance

Title of Responsible Official (please print)

APPENDIX E
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1346-4-11

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC.
MAILING ADDRESS: 2000 N PLAZA DR
VISALIA, CA 93291-9258

LOCATION: 11894 AVENUE 120
TIPTON, CA 93272

SECTION: SW17 **TOWNSHIP:** 22S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 30 MMBTU/HR CE ROGERS NATURAL GAS-FIRED VERTICAL SPRAY MILK DRYER MODEL VRS13000 WITH "MAXON" LOW-NOX BURNER, CE ROGERS BAGHOUSE, AND CE ROGERS ENCLOSED SCREEN SIFTER WITH "DEAD-END" BAGHOUSE: REPLACE THE 30 MMBTU/HR "MAXON" LOW-NOX BURNER WITH A 30 MMBTU/HR "MAXON CROSSFIRE" LOW-NOX BURNER

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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Dryer shall be fired on PUC-quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emission rates shall not exceed any of the following limits: SOx (as SO2): 0.001 lb/MMBTU, NOx (as NO2): 3.7 ppmv at stack conditions, VOC: 0.003 lb/MMBTU or CO: 30 ppmv at stack conditions. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit.
6. Emissions for NOx and CO shall be uncorrected if the measured oxygen exhaust concentration exceeds 19.0% by volume or shall be corrected to 19.0% by volume for units operating at measured O2 concentrations of 19.0 % by volume or less. [District Rules 2520 and 4309] 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-1346-4-11 : Sep 29 2011 1:54PM - DAVIDSOS : Joint Inspection Required with DAVIDSOS

7. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520 and 4309] Federally Enforceable Through Title V Permit
8. If either the NO_x or CO concentrations as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 2520 and 4309] Federally Enforceable Through Title V Permit
9. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 2520 and 4309] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2520 and 4309] Federally Enforceable Through Title V Permit
11. For emissions source testing performed pursuant to Section 6.3 of District Rule 4309, (adopted December 15, 2005), for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three (3) 30- consecutive-minute test runs shall apply. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 2520 and 4309, 5.5.6] Federally Enforceable Through Title V Permit
12. Visible emissions shall be less than 5% opacity except for 3 minutes in any one hour. [District NSR Rule and 40 CFR part 64] Federally Enforceable Through Title V Permit
13. PM₁₀ emissions from the CE Rogers dryer baghouse shall not exceed 0.182 lb/ton of powder processed. [District Rule 2201 and 40 CFR part 64] Federally Enforceable Through Title V Permit
14. Process weight rate shall not exceed 150 tons/day of powder. [District Rule 2201 and 40 CFR part 64] Federally Enforceable Through Title V Permit
15. Fuel usage shall not exceed 686 MMBtu in any day and 35,000 MMBtu/qtr, or 140,000 MMBtu in a year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Screened powder shall be pneumatically transported to storage silo receiving bin for filling storage silos (S-1346-6, '-7, '-8, '-15, '-16 & '-17). [District NSR Rule] Federally Enforceable Through Title V Permit
17. District witnessed source testing to measure NO_x and CO emissions shall be conducted within 60 days of start up. [District Rules 1081, 7.2, 2201, and 4309] Federally Enforceable Through Title V Permit
18. District witnessed source testing to measure PM₁₀, NO_x and CO emissions shall be conducted every 24 months. [District Rules 1081, 7.2, 2201, and 4309] Federally Enforceable Through Title V Permit
19. Permittee shall maintain accurate records of daily fuel consumption, operating hours, and daily throughputs and shall make such records available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.3.2, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE