



AUG 19 2013

Mr. Sy Dang Le
California Dairies
755 F Street
Fresno, CA 93706

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # C- 402 & S-7063
Project # C-1131183 & S-1131432**

Dear Mr. Le:

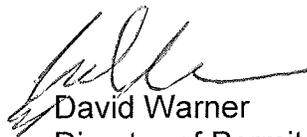
Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This project revises minimum differential pressure limits for baghouses serving milk spray dryers.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct 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: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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**San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review**

Facility Name: California Dairies, Inc
Mailing Address: 2000 North Plaza Drive
Visalia, CA 93291

Date: June 27, 2013
Engineer: Robert Rinaldi
Lead Engineer: Kris Rickards

Contact Person: Sy Dang Le
Telephone: (559) 654-7141
Fax:
E-Mail:

 6/6/13

Application #(s): S-7063-7-4, '-10-3, '-12-3, C-402-5-5 and '-6-7

Project #: S-1131432 and C-1131183

Deemed Complete: May 7, 2013

I. Proposal

California Dairies, Inc has requested an Authority to Construct (ATC) to modify the minimum differential pressure of the baghouses serving the facilities to 0.25 inch water column.

The proposed revision is not a NSR modification (please see Compliance Section). Therefore, requirements of BACT, offsets, and public notice do not need to be considered.

California Dairies, Inc facilities S-7063 and C-402 received their Title V Permits on July 31, 2012. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. California Dairies, Inc 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 (06/21/01)
Rule 4001 New Source Performance Standards (04/14/99)
Rule 4101 Visible Emissions (02/17/05)
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)
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

Facility S-7063 is located at 2000 N Plaza Dr, Visalia, CA. and Facility C-402 is located 755 F Street, Fresno, CA. The facilities are not located within 1,000 feet of a K-12 school.

Therefore, the noticing provisions of CH&SC 42301.6 are not applicable to this project.

IV. Process Description

California Dairies Inc. operates milk processing facilities in Visalia & Fresno, CA. The facilities process raw milk to produce powdered milk and butter.

V. Equipment Listing

Pre-Project Equipment Description:

- S-7063-7-3: 40 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO 46,450 CFM CPS MODEL 262-015 BAGHOUSE DUST COLLECTORS, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

- S-7063-10-2: BAGGING OPERATION CONSISTING OF ONE 1,000 CFM BIN VENT FILTER SERVING THE TOTE BAG FILLER, TWO 850 CFM BIN VENT FILTERS SERVING TWO CAROUSEL FILLERS EACH, AND ONE 10,000 CFM DONALDSON TORIT DUST COLLECTOR MODEL DLMC 2/4/15 SERVING THE BAGGING ROOM: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

- S-7063-12-2: 40.0 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO CPS BAGHOUSES, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

- C-402-5-4: 20 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

- C-402-6-6: 20 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

Proposed Modifications:

- S-7063-7-4: MODIFICATION OF 40 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO 46,450 CFM CPS MODEL 262-015 BAGHOUSE DUST COLLECTORS, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES
- S-7063-10-3: MODIFICATION OF BAGGING OPERATION CONSISTING OF ONE 1,000 CFM BIN VENT FILTER SERVING THE TOTE BAG FILLER, TWO 850 CFM BIN VENT FILTERS SERVING TWO CAROUSEL FILLERS EACH, AND ONE 10,000 CFM DONALDSON TORIT DUST COLLECTOR MODEL DLMC 2/4/15 SERVING THE BAGGING ROOM: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES
- S-7063-12-3: MODIFICATION OF 40.0 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO CPS BAGHOUSES, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES
- C-402-5-5: MODIFICATION OF 20 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES
- C-402-6-7: MODIFICATION OF 20 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

Post Project Equipment Description:

- S-7063-7-4: 40 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO 46,450 CFM CPS MODEL 262-015 BAGHOUSE DUST COLLECTORS, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER
- S-7063-10-3: BAGGING OPERATION CONSISTING OF ONE 1,000 CFM BIN VENT FILTER SERVING THE TOTE BAG FILLER, TWO 850 CFM BIN VENT FILTERS SERVING TWO CAROUSEL FILLERS EACH, AND ONE 10,000 CFM DONALDSON TORIT DUST COLLECTOR MODEL DLMC 2/4/15 SERVING THE BAGGING ROOM
- S-7063-12-3: 40.0 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO CPS BAGHOUSES, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER
- C-402-5-5: 20 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE
- C-402-6-7: 20 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES

VI. Emission Control Technology Evaluation

No change to any existing emission control technology and no change to method of operation is proposed. Therefore, an emission control technology evaluation is not required. The applicant states that baghouse bags are very clean due to the bag vibration system and the bags are routinely changed every six months, therefore the minimum differential pressure referenced on the permit needs to be lowered as clean bags typically operate with a lower differential pressure.

VII. General Calculations

This project does not meet the criteria for a Rule 2201 Modification, as defined in Section 3.26, and is not subject to the requirements of Rule 2201. Therefore, formal calculations for Rule 2201 are not necessary and no further discussion is required.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

Section 3.25 of Rule 2201 defines an NSR modification as an action including at least one of the following items:

- Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- Any structural change or addition to an existing emissions unit, which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- Addition of any new emissions unit that is subject to District permitting requirements.
- A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

The revision to the permit results in no change in emissions, no change in hours of operation, and no change in production rate. This project does not change operations and is only to modify the minimum differential pressure of the baghouses serving the facilities to 0.25 inch water column. Furthermore, the project is not being done to obtain an exemption from an applicable requirement to which the source would otherwise be subject. Therefore the project is not a NSR Modification and Rule 2201 is not applicable.

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, these facilities have applied for Certificates of Conformity (COC). Therefore, these facilities 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 4001 New Source Performance Standards

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 milk spray dryers.

Rule 4101 Visible Emissions

Rule 4101 states 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 as dark as, or darker than, Ringelmann 1 or 20% opacity.

Since the milk dryer is controlled by a baghouse, the visible emissions from the baghouse will be limited to 5% opacity. The following condition will be added to the permit to assure compliance with this visible emission limit.

- Visible emissions from the baghouses serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour.
[District Rule 2201]

Therefore, 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.

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.

Drying Operation:

F-Factor for NG:	8,578 dscf/MMBtu at 60 °F	
PM10 Emission Factor:	0.0076 lb-PM10/MMBtu	
Percentage of PM as PM10 in Exhaust:	100%	
Exhaust Oxygen (O ₂) Concentration:	3%	
Excess Air Correction to F Factor =	$\frac{20.9}{(20.9 - 3)}$	= 1.17

$$GL = \left(\frac{0.0076 \text{ lb-PM}}{\text{MMBtu}} \times \frac{7,000 \text{ grain}}{\text{lb-PM}} \right) / \left(\frac{8,578 \text{ ft}^3}{\text{MMBtu}} \times 1.17 \right)$$

$$GL = 0.0053 \text{ grain/dscf} < 0.1 \text{ grain/dscf}$$

Collection Operation (Baghouses):

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM emission rate}) \times (7,000 \text{ gr/lb})}{(\text{Air flow rate}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM₁₀ emission rate = 44.8 lb/day. Assuming 100% of PM is PM₁₀
Exhaust Gas Flow = 10,000 scfm

$$\text{PM Conc. (gr/scf)} = [(44.8 \text{ lb/day}) * (7,000 \text{ gr/lb})] \div [(10,000 \text{ ft}^3/\text{min}) * (60 \text{ min/hr}) * (24 \text{ hr/day})]$$

$$\text{PM Conc.} = 0.002 \text{ gr/scf}$$

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

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. Equipment controlled with baghouses comply with this Rule.

The proposed dryers run on natural gas and compliance with this Rule is expected.

Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO₂, NO₂, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μm in diameter.

District Rule 4301 Limits			
Pollutant	NO₂	Total PM	SO₂
ATC#'s: S-7063-7-4 & '-12-3 (lb/hr)	1.84	0.30	0.11
ATC#: C-402-5-5	1.2	2.3	0.06
ATC#: C-402-6-7	1.2	1.9	0.06
Rule Limit (lb/hr)	140	10	200

The above table indicates compliance with the maximum lb/hr emissions in this rule; therefore, continued compliance is expected.

Rule 4309 Dryers, Dehydrators, and Ovens

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_x) 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. Since the dryers being modified in this project have heat input ratings greater than 5.0 MMBtu, these dryers are subject to the requirements of this rule.

Section 5.0, Requirements

Section 5.0 states that all ppmv limits specified in this section are referenced at dry stack gas conditions and adjusted using an oxygen correction factor of 19% by volume.

Section 5.2 requires that except for dehydrators, NO_x and CO emissions shall not exceed the limits specified in the table below on and after the full compliance schedules specified in Sections 7.1 and 7.3, as appropriate. All ppmv emission limits specified in this section are referenced at dry stack gas conditions and 19 percent by volume stack gas oxygen. Emission concentrations shall be corrected to 19 percent oxygen in accordance with Section 5.0.

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
Milk, Cheese, and Dairy Processing > 20 MMBtu/hr	5.3	5.3	42	42

The units being installed in this project are milk dryers with a maximum heat input greater than 20 MMBtu/hr; therefore it is subject to the requirements of the Milk, Cheese, and Dairy Processing > 20 MMBtu/hr category listed in the table above.

For the units (worst case):

- the proposed NO_x emission factor is 5.3 ppmvd @ 19% O₂ (0.0606 lb/MMBtu), and the proposed CO emission factor is 42 ppmvd @ 19% O₂ (0.29 lb/MMBtu).

Therefore, compliance with this section is expected.

A permit condition listing the emissions limits will be listed on permits.

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 Rule 4306, *Boilers, Steam Generators, and Process Heaters – Phase 3*, 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 5.4.1.2.3 states that the operator shall source test over the proposed range of surrogate operating parameter(s) to demonstrate compliance with the applicable emission limits. The unit will be source tested upon initial operation as is required by Section 6.3.2 of this Rule; therefore compliance with this section is assured.

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 dryer 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-consecutiveminute 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 5.5.6 states that for emissions source testing performed pursuant to Section 6.3.1 to determine compliance with an applicable emission limit of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two of the three runs 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 test runs is less than the applicable limit. The following condition will be added to the permit to assure compliance with this section.

- For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [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 startup 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 6.3.2 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.

Therefore, compliance with the requirements of this rule is expected.

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.

$$\begin{aligned} \text{SO}_x &= (0.00285 \text{ lb-SO}_x/\text{MMBtu}) \times (1 \text{ mol SO}_x/64 \text{ lb SO}_x) \times (379.3 \text{ dscf SO}_x/1 \text{ mol} \\ &\quad \text{SO}_x) \times (1 \times 10^6 \text{ Btu/ } 8578 \text{ dscf SO}_x) \times (1 \times 10^6/\text{MM}) \\ &= \mathbf{2.0 \text{ ppmv} \ll 2000 \text{ ppmv}} \end{aligned}$$

Since 2.0 ppmv is \leq 2,000 ppmv, continued compliance with the requirements of this rule 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)

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 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, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

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 Authorities to Construct (ATC) S-7063-7-4, '-10-3, '-12-3, C-402-5-5 and '-6-7 subject to the permit conditions listed on the attached draft Authorities to Construct in Attachment II.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-7063-7-4	3020-02-H	40 MMBtu/hr dryer	\$1,030.00
S-7063-10-3	3020-01-B	42 hp, electric	\$117.00
S-7063-12-3	3020-02-H	40 MMBtu/hr dryer	\$1,030.00
C-402-5-5	3020-02-H	20 MMBtu/hr dryer	\$1,030.00
C-402-6-7	3020-02-H	20 MMBtu/hr dryer	\$1,030.00

Attachments

I: Current PTOs

II: Draft ATCs

ATTACHMENT I
Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-402-5-4

EXPIRATION DATE: 01/31/2016

EQUIPMENT DESCRIPTION:

20 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. The permittee shall operate a nonresettable elapsed operating time meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 4101 and 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 3.5 inches water column and a maximum differential pressure of 10.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The Marriot-Walker dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
8. The operating schedule of this milk spray dryer shall not exceed 6,760 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Dry milk powder production for this dryer shall not exceed a total of 90 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions from the Marriot-Walker Milk Spray Dryer shall not exceed 0.606 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NOx @ 19% O2 (equivalent to 0.0606 lb-NOx/MMBtu), 0.003 lb-SOx/MMBtu, 42 ppmvd CO @ 19% O2 (equivalent to 0.29 lb-CO/MMBtu), or 0.0046 lb-VOC/MMBtu. If measured O2 concentration is greater than 19%, the corrected NOx or CO concentration is equal to the measured NOx or CO concentration. [District Rules 2201 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.

12. 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] Federally Enforceable Through Title V Permit
13. Source testing to measure NOx and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
14. Source testing to measure PM10 emissions (measured as lb-PM10/ton processed) from the baghouse serving the Marriot-Walker Milk Spray Dryer shall be conducted on an annually basis. [District Rule 1081] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
23. The permittee shall monitor and record the stack concentration of NOx, 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] Federally Enforceable Through Title V Permit
24. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 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 performing the notification and testing required by this condition. [District Rule 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.

25. 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] Federally Enforceable Through Title V Permit
26. 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 (or no correction if measured above 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] Federally Enforceable Through Title V Permit
27. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of annual hours of operation of the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
31. 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, 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
32. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. For the Marriot-Walker baghouses, 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
34. For the Marriot-Walker baghouses, 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
35. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Marriot-Walker baghouses, 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
36. 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. [40 CFR 64] Federally Enforceable Through Title V Permit
37. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] 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-402-6-6

EXPIRATION DATE: 01/31/2016

EQUIPMENT DESCRIPTION:

20 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES

PERMIT UNIT REQUIREMENTS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 4101 and 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 3.0 inches water column and a maximum differential pressure of 10.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The Niro Atomizer dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. Dry milk powder production for this dryer shall not exceed a total of 144 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the Niro Atomizer Dryer shall not exceed 0.309 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NO_x @ 19% O₂ (equivalent to 0.0606 lb-NO_x/MMBtu), 0.003 lb-SO_x/MMBtu, 22 ppmvd CO @ 19% O₂ (equivalent to 0.1525 lb-CO/MMBtu), or 0.033 lb-VOC/MMBtu. If measured O₂ concentration is greater than 19%, the corrected NO_x or CO concentration is equal to the measured NO_x or CO concentration. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
10. 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] Federally Enforceable Through Title V Permit
11. Source testing to measure NO_x and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 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.

12. Source testing to measure PM10 emissions (measured as lb-PM10/ton processed) from the two baghouses serving the Niro Atomizer dryer shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
17. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NOx, 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] Federally Enforceable Through Title V Permit
22. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 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 performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
23. 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] 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.

24. 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 (or no correction if measured above 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] Federally Enforceable Through Title V Permit
25. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
28. 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, 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
29. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. For the baghouses, 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
31. For the baghouses, 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
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the baghouses, 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
33. 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. [40 CFR 64] Federally Enforceable Through Title V Permit
34. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-7-3

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

40 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO 46,450 CFM CPS MODEL 262-015 BAGHOUSE DUST COLLECTORS, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 10 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum amount of material processed shall not exceed 255.2 tons of finished product in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Combustion emissions from the natural gas-fired unit shall not exceed any of the following limits: 3.5 ppmvd NO_x @ 19% O₂ (equivalent to 0.040 lb-NO_x/MMBtu), 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 32.6 ppmvd CO @ 19% O₂ (equivalent to 0.227 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O₂ concentration is greater than 19%, the corrected NO_x or CO concentration is equal to the measured NO_x or CO concentration. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
10. The combined combustion and material processing PM₁₀ emission factor from the milk drying operation shall not exceed 0.17 lb/ton finished product. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM₁₀ emissions from the bin vent filter serving the transfer hopper shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Source testing to measure NO_x and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months thereafter. [District Rules 2201 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.

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
17. 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] Federally Enforceable Through Title V Permit
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The 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] Federally Enforceable Through Title V Permit
22. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 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 performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. 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 (or no correction if measured above 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] 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.

25. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
27. Permittee shall maintain daily records of the amount of material processed. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
28. 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] Federally Enforceable Through Title V Permit
29. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. For the baghouses, 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
31. For the baghouses, 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
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Dustex model 3610-14-34 baghouses, 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
33. 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. [40 CFR 64] Federally Enforceable Through Title V Permit
34. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-10-2

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

BAGGING OPERATION CONSISTING OF ONE 1,000 CFM BIN VENT FILTER SERVING THE TOTE BAG FILLER, TWO 850 CFM BIN VENT FILTERS SERVING TWO CAROUSEL FILLERS EACH, AND ONE 10,000 CFM DONALDSON TORIT DUST COLLECTOR MODEL DLMC 2/4/15 SERVING THE BAGGING ROOM

PERMIT UNIT REQUIREMENTS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the powder milk bagging operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 10 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the baghouse serving the bagging room shall not exceed 0.001 grains/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
9. The amount of milk powder processed in the bagging operation shall not exceed 510.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall maintain records of daily bagging system throughput. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
12. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-7063-12-2

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

40.0 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO CPS BAGHOUSES, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 10 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum amount of material processed shall not exceed 255.2 tons of finished product in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Combustion emissions from the natural gas-fired unit shall not exceed any of the following limits: 3.5 ppmvd NO_x @ 19% O₂ (equivalent to 0.040 lb-NO_x/MMBtu), 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 32.6 ppmvd CO @ 19% O₂ (equivalent to 0.227 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O₂ concentration is greater than 19%, the corrected NO_x or CO concentration is equal to the measured NO_x or CO concentration. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
10. The combined combustion and material processing PM₁₀ emission factor from the milk drying operation shall not exceed 0.17 lb/ton finished product. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM₁₀ emissions from the bin vent filter serving the transfer hopper shall not exceed 0.059 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. 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] Federally Enforceable Through Title V Permit
13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
17. 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] Federally Enforceable Through Title V Permit
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
20. PM₁₀ emissions for source test purposes shall be determined using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202 or CARB Method 501 in combination with CARB Method 5. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The 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] Federally Enforceable Through Title V Permit
23. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 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 performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
24. 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] 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.

25. 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 (or no correction if measured above 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] Federally Enforceable Through Title V Permit
26. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
28. Permittee shall maintain daily records of the amount of material processed. [District Rule 1070] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
31. For the baghouses, 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
32. For the baghouses, 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
33. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Dustex model 3610-14-34 baghouses, 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
34. 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. [40 CFR 64] Federally Enforceable Through Title V Permit
35. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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

ATTACHMENT II
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-402-5-5

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC.

MAILING ADDRESS: PO BOX 11865
FRESNO, CA 93775-1865

LOCATION: 755 F ST
FRESNO, CA 93706-3415

EQUIPMENT DESCRIPTION:

MODIFICATION OF 20 MMBTU/HR NATURAL GAS/LPG FIRED MARRIOT-WALKER MODEL 60-24-12 MILK SPRAY DRYER SERVED BY A MARRIOT WALKER BAGHOUSE: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSE

CONDITIONS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. The permittee shall operate a nonresettable elapsed operating time meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 4101 and 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10.0 inches water column. [District Rule 2201 and 40 CFR Part 64] 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

DAVID WARNER, Director of Permit Services

C-402-5-5: Jul 23 2013 4:15PM -- RINALDIR : Joint Inspection NOT Required

7. The Marriot-Walker dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
8. The operating schedule of this milk spray dryer shall not exceed 6,760 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Dry milk powder production for this dryer shall not exceed a total of 90 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions from the Marriot-Walker Milk Spray Dryer shall not exceed 0.606 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NOx @ 19% O2 (equivalent to 0.0606 lb-NOx/MMBtu), 0.003 lb-SOx/MMBtu, 42 ppmvd CO @ 19% O2 (equivalent to 0.29 lb-CO/MMBtu), or 0.0046 lb-VOC/MMBtu. If measured O2 concentration is greater than 19%, the corrected NOx or CO concentration is equal to the measured NOx or CO concentration. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
12. 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] Federally Enforceable Through Title V Permit
13. Source testing to measure NOx and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
14. Source testing to measure PM10 emissions (measured as lb-PM10/ton processed) from the baghouse serving the Marriot-Walker Milk Spray Dryer shall be conducted on an annually basis. [District Rule 1081] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

23. 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] Federally Enforceable Through Title V Permit
24. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 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 performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
25. 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] Federally Enforceable Through Title V Permit
26. 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 (or no correction if measured above 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] Federally Enforceable Through Title V Permit
27. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of annual hours of operation of the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
31. 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, 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
32. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. For the Marriot-Walker baghouses, 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
34. For the Marriot-Walker baghouses, 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

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CONDITIONS CONTINUE ON NEXT PAGE

35. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Marriot-Walker baghouses, 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
36. 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. [40 CFR 64] Federally Enforceable Through Title V Permit
37. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-402-6-7

LEGAL OWNER OR OPERATOR: CALIFORNIA DAIRIES, INC.
MAILING ADDRESS: PO BOX 11865
FRESNO, CA 93775-1865

LOCATION: 755 F ST
FRESNO, CA 93706-3415

EQUIPMENT DESCRIPTION:

MODIFICATION OF 20 MMBTU/HR NATURAL GAS/LPG FIRED NIRO ATOMIZER MODEL 1000 COMPACT DRYER WITH A MAXON RG-NP-1 BURNER SERVED BY TWO BAGHOUSES: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

CONDITIONS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 4101 and 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The Niro Atomizer dryer shall be fired solely on natural gas or LPG. [District Rules 2201 and 4309] 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

DAVID WARNER, Director of Permit Services
C-402-6-7: Jul 23 2013 4:15PM - RINALDIR : Joint Inspection NOT Required

7. Dry milk powder production for this dryer shall not exceed a total of 144 ton/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the Niro Atomizer Dryer shall not exceed 0.309 lb-PM10/ton of dry milk powder. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the natural gas and LPG/propane-fired unit shall not exceed any of the following limits: 5.3 ppmvd NOx @ 19% O2 (equivalent to 0.0606 lb-NOx/MMBtu), 0.003 lb-SOx/MMBtu, 22 ppmvd CO @ 19% O2 (equivalent to 0.1525 lb-CO/MMBtu), or 0.033 lb-VOC/MMBtu. If measured O2 concentration is greater than 19%, the corrected NOx or CO concentration is equal to the measured NOx or CO concentration. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
10. 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] Federally Enforceable Through Title V Permit
11. Source testing to measure NOx and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
12. Source testing to measure PM10 emissions (measured as lb-PM10/ton processed) from the two baghouses serving the Niro Atomizer dryer shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
17. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202, or CARB Method 501 in combination with Method 5. EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NOx, 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] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 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 performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2 (or no correction if measured above 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] Federally Enforceable Through Title V Permit
25. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Permittee shall maintain a record of the milk powder production from this operation, in tons/day. [District Rule 1070 and Fresno County Rule 107] Federally Enforceable Through Title V Permit
28. 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, 4309, and Fresno County Rule 107] Federally Enforceable Through Title V Permit
29. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. For the baghouses, 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
31. For the baghouses, 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
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the baghouses, 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
33. 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. [40 CFR 64] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

34. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-7063-7-4

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

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 40 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO 46,450 CFM CPS MODEL 262-015 BAGHOUSE DUST COLLECTORS, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

CONDITIONS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services
S-7063-7-4 : Jul 23 2013 3:55PM - RINALDIR : Joint Inspection NOT Required

6. The unit shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum amount of material processed shall not exceed 255.2 tons of finished product in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Combustion emissions from the natural gas-fired unit shall not exceed any of the following limits: 3.5 ppmvd NO_x @ 19% O₂ (equivalent to 0.040 lb-NO_x/MMBtu), 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 32.6 ppmvd CO @ 19% O₂ (equivalent to 0.227 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O₂ concentration is greater than 19%, the corrected NO_x or CO concentration is equal to the measured NO_x or CO concentration. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
10. The combined combustion and material processing PM₁₀ emission factor from the milk drying operation shall not exceed 0.17 lb/ton finished product. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM₁₀ emissions from the bin vent filter serving the transfer hopper shall not exceed 0.0055 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Source testing to measure NO_x and CO emissions from this unit when fired on natural gas shall be conducted at least once every 24 months thereafter. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
17. 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] Federally Enforceable Through Title V Permit
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The 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] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 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 performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. 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 (or no correction if measured above 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] Federally Enforceable Through Title V Permit
25. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
27. Permittee shall maintain daily records of the amount of material processed. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
28. 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] Federally Enforceable Through Title V Permit
29. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. For the baghouses, 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
31. For the baghouses, 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
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Dustex model 3610-14-34 baghouses, 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
33. 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. [40 CFR 64] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

34. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-7063-10-3

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

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF BAGGING OPERATION CONSISTING OF ONE 1,000 CFM BIN VENT FILTER SERVING THE TOTE BAG FILLER, TWO 850 CFM BIN VENT FILTERS SERVING TWO CAROUSEL FILLERS EACH, AND ONE 10,000 CFM DONALDSON TORIT DUST COLLECTOR MODEL DLMC 2/4/15 SERVING THE BAGGING ROOM: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSE

CONDITIONS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the powder milk bagging operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
S-7063-10-3 : Jul 23 2013 3:56PM - RINALDIR : Joint Inspection NOT Required

7. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the baghouse serving the bagging room shall not exceed 0.001 grains/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
9. The amount of milk powder processed in the bagging operation shall not exceed 510.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall maintain records of daily bagging system throughput. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and Tulare County Rule 107] Federally Enforceable Through Title V Permit
12. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: S-7063-12-3

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

LOCATION: 2000 NORTH PLAZA DRIVE
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 40.0 MMBTU/HR CPS NATURAL GAS-FIRED MILK SPRAY DRYER WITH A MAXON CROSSFIRE MODEL 7BIXFLDR ULTRA LOW NOX BURNER SERVED BY FOUR CYCLONES AND TWO CPS BAGHOUSES, SHAKING FLUID BED AND SURGE HOPPER SERVED BY THE CPS BAGHOUSES, AND ONE TRANSFER HOPPER SERVED BY A BIN VENT FILTER: REVISE MINIMUM DIFFERENTIAL PRESSURE LIMITS FOR BAGHOUSES

CONDITIONS

1. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouse shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the bags. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the milk dryer shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 0.25 inches water column and a maximum differential pressure of 10 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC quality natural gas. [District Rules 2201 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-7063-12-3 : Jul 23 2013 3:56PM - RINALDIR : Joint Inspection NOT Required

7. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum amount of material processed shall not exceed 255.2 tons of finished product in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Combustion emissions from the natural gas-fired unit shall not exceed any of the following limits: 3.5 ppmvd NO_x @ 19% O₂ (equivalent to 0.040 lb-NO_x/MMBtu), 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 32.6 ppmvd CO @ 19% O₂ (equivalent to 0.227 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O₂ concentration is greater than 19%, the corrected NO_x or CO concentration is equal to the measured NO_x or CO concentration. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
10. The combined combustion and material processing PM₁₀ emission factor from the milk drying operation shall not exceed 0.17 lb/ton finished product. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM₁₀ emissions from the bin vent filter serving the transfer hopper shall not exceed 0.059 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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] Federally Enforceable Through Title V Permit
13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
17. 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] Federally Enforceable Through Title V Permit
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
20. PM₁₀ emissions for source test purposes shall be determined using EPA Method 201 and EPA Method 202, or EPA Method 201a and EPA Method 202 or CARB Method 501 in combination with CARB Method 5. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The 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] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

23. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 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 performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
24. 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] Federally Enforceable Through Title V Permit
25. 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 (or no correction if measured above 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] Federally Enforceable Through Title V Permit
26. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
28. Permittee shall maintain daily records of the amount of material processed. [District Rule 1070] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. During each day of operation, the permittee shall record the differential pressure of the baghouses and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
31. For the baghouses, 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
32. For the baghouses, 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
33. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for the Dustex model 3610-14-34 baghouses, 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
34. 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. [40 CFR 64] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

35. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

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