



JUL 24 2012

Sy Dang Le  
California Dairies, Inc  
475 S. Tegner Road  
Turlock, CA 95380

**Re: Notice of Final Action - Title V Permit  
District Facility # N-2149  
Project # N-1110109**

Dear Mr. Le:

The District has issued the Final Title V Permit for California Dairies, Inc. The preliminary decision for this project was made on June 8, 2012. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

  
David Warner  
Director of Permit Services

Attachments

cc: Juscelino Siongco, Permit Services Engineer

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

---

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

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



JUL 24 2012

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit  
District Facility # N-2149  
Project # N-1110109**

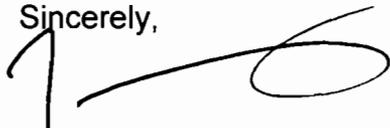
Dear Mr. Rios:

The District has issued the Final Title V Permit for California Dairies, Inc. The preliminary decision for this project was made on June 8, 2012. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

Attachments

cc: Juscellino Siongco, Permit Services Engineer

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Executive Director/Air Pollution Control Officer

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JUL 24 2012

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit**  
**District Facility # N-2149**  
**Project # N-1110109**

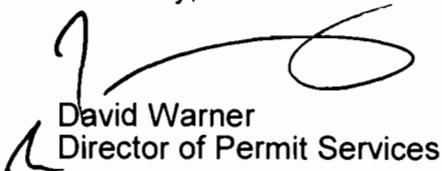
Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for California Dairies, Inc. The preliminary decision for this project was made on June 8, 2012. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

  
David Warner  
Director of Permit Services

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Modesto Bee

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT  
NOTICE OF FINAL DECISION TO ISSUE  
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to California Dairies, Inc for its milk processing facility, 475 S. Tegner Road, Turlock, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1110109, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. For additional information regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

# **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT**

**California Dairies, Inc.**

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# **TITLE V APPLICATION REVIEW**

Project #: N-1110109  
Deemed Complete: 01/24/11

Engineer : Juscelino Siongco  
Date: July 24, 2012

Facility Number: N-2149  
Facility Name: California Dairies, Inc.  
Mailing Address: 475 S. Tegner Road  
Turlock, CA 95380

Contact Name: Sy Dang Le  
Phone: (559) 233-5154 x.119

Responsible Official: Sy Dang Le  
Title: Director of Safety and Environmental

## **I. PROPOSAL**

California Dairies, Inc. is proposing that an initial Title V permit be issued for its milk processing facility located in Turlock, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

## **II. FACILITY LOCATION**

California Dairies, Inc. is located at 475 S. Tegner Road in Stanislaus County, CA.

## **III. EQUIPMENT LISTING**

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories, which describe the insignificant activities or equipment at the facility not requiring a permit, is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

#### **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant does not propose to use any model general permit templates.

#### **V. SCOPE OF EPA AND PUBLIC REVIEW**

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

#### **VI. REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES**

The applicant has not proposed to utilize any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of the general permit templates.

#### **VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES**

District Rule 1070, Inspections (amended December 17, 1992)

District Rule 1100, Equipment Breakdown (amended December 17, 1992)

District Rule 1160, Emission Statements (adopted November 18, 1992)

District Rule 2010, Permits Required (amended December 17, 1992)

District Rule 2020, Exemptions (amended August 18, 2011)

District Rule 2031, Transfer of Permits (adopted December 17, 1992)

District Rule 2040, Applications (amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (adopted December 17, 1992)

District Rule 2080, Conditional Approval (amended December 17, 1992)

District Rule 2201, New and Modified Stationary Source Review Rule (amended April 21, 2011)

District Rule 2520, Federally Mandate Operating Permits (amended June 21, 2001)

District Rule 4101, Visible Emissions (amended February 17, 2005)

District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)

District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2 (Amended August 21, 2003)

District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3 (amended October 16, 2008)

District Rule 4309, Dryers, Dehydrators, and Ovens (adopted December 15, 2005)

District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (amended October 16, 2008)

District Rule 4701, Internal Combustion Engines (amended August 21, 2003)

District Rule 4702, Internal Combustion Engines (amended August 18, 2011)

District Rule 8011, General Requirements (amended August 19, 2004)

District Rule 8021, Construction, Demolition, Excavation, and Other Earthmoving Activities (amended August 19, 2004)

District Rule 8031, Bulk Materials (amended August 19, 2004)

District Rule 8041, Carryout and Trackout (amended August 19, 2004)

District Rule 8051, Open Areas (amended August 19, 2004)

District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)

District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)

40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

40 CFR Part 82, Subpart B and F, Stratospheric Ozone

## **VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE**

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits.

The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

**A. District Rule 4102 - Nuisance**

1. N-2149-0-2 – Facility-Wide Requirements

- Condition 39 on the proposed permit assures compliance with the requirements of this rule.

**B. Title 17 CCR, Section 93115 - Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines**

1. N-2149-7-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

- Conditions 1, 3, 5, 11, and 12 comply with this rule.

**IX. COMPLIANCE**

**A. Requirements Addressed by Model General Permit Templates**

**1. Facility Wide Requirements**

The applicant proposes not to utilize any model general permit templates. All applicable requirements are addressed in the following sections.

**B. Requirements Not Addressed by Model General Permit Templates**

**1. District Rule 1070 – Inspections**

The purpose of this rule is to explain the District's authority in determining compliance with the requirements of these rules and regulations. District Rule 1070 has been submitted to the EPA to replace Stanislaus County Rule 107 that is in the State Implementation Plan (SIP). District Rule 1070 is at least as stringent as Stanislaus County 107 as shown in the following comparison:

**Comparison of District Rule 1070 to Stanislaus County Rule 107**

REQUIREMENTS	District Rule 1070	Stanislaus Rule 107
Inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations.	X	X
The District also has the authority to require record keeping, to make inspections and to conduct tests of air pollution sources.	X	X

- a. N-2149-1-3: POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7500 SCFM
  - Condition 10 on the proposed permit complies with this rule.
  
- b. N-2149-2-7: 11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER
  - Condition 36 on the requirements for this permit complies with this rule.
  
- c. N-2149-3-7: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM
  - Condition 20 on the requirements for this permit complies with this rule.
  
- d. N-2149-4-7: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER.
  - Condition 20 on the requirements for this permit complies with this rule.

- e. N-2149-5-4: 31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS
  - Condition 34 on the requirements for this permit complies with this rule.
- f. N-2149-6-2: POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE
  - Condition 12 on the requirements for this permit complies with this rule.
- g. N-2149-8-1: DRY MILK BLENDING OPERATION CONSISTS TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY DONALDSON MODEL 2DF12 DUST COLLECTOR
  - Condition 10 on the requirements for this permit complies with this rule.

## **2. District Rule 1081 - Source Sampling**

This rule ensures that any source operation which emits or may emit air contaminants provides adequate and safe facilities for use in sampling to determine compliance. The rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

- a. N-2149-2-7: 11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER
  - Conditions 15, 24, and 25 on the requirements for the proposed permit comply with this rule.
- b. N-2149-3-7: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM
  - Conditions 14 and 19 on the requirements for the proposed permit comply with this rule.

c. N-2149-4-7: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER

- Conditions 14 and 19 on the requirements for the proposed permit comply with this rule.

d. N-2149-5-4: 31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS

- Conditions 23 and 24 on the requirements for the proposed permit comply with this rule.

### **3. District Rule 1100 – Equipment Breakdown**

This rule defines a breakdown condition and the procedures to follow if one occurs. The corrective action, the issuance of an emergency variance, and the reporting requirements are also specified. Sections 6.0 and 7.0 prescribe breakdown procedures and reporting requirements. District Rule 1100 has been submitted to the EPA to replace Stanislaus County Rule 110 that is in the State Implementation Plan (SIP). District Rule 1100 is at least as stringent as the county SIP rule addressing breakdowns, as shown in the following comparison:

**Comparison of District Rule 1100 to Stanislaus County Rule 110**

<b>REQUIREMENTS</b>	<b>District Rule 1100</b>	<b>Stanislaus Rule 110</b>
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	X	X
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	X	X
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	X	X
1) A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	X	X
2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	X	X
3) A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	X	
4) Pictures of the equipment or controls which failed if available.	X	

a. N-2149-0-2: Facility-Wide Requirements

- Conditions 1 and 2 on the requirements for the proposed permit comply with this rule.

**4. District Rule 1160 – Emission Statements**

The purpose of this rule is to provide the District with an accurate accounting of emissions from significant sources with which the District and California EPA Air Resources Board (ARB) can compile an accurate inventory. Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emissions statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the Air Resources Board (ARB) with an emissions inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB.

a. N-2149-0-2: Facility-Wide Requirements

- Condition 3 on the requirements for the proposed permit complies with this rule.

## **5. District Rule 2010 – Permits Required**

District Rule 2010 sections 3.0 and 4.0 requires any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted.

### **a. N-2149-0-2: Facility-Wide Requirements**

- Condition 4 on the requirements for the proposed permit complies with this rule.

## **6. District Rule 2020 – Exemptions**

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The rule was amended in August 8, 2011. Since the amendments do not affect the current permit requirements, the changes to the rule will not be addressed in this evaluation.

### **a. N-2149-0-2: Facility-Wide Requirements**

- Condition 4 on the requirements for the proposed permit complies with this rule.

## **7. District Rule 2031 – Transfer of Permits**

This rule requires a permit to operate or an authority to construct shall not be transferable, whether by operation of law or otherwise, from one location to another, from one piece of equipment to another, or from one person to another, unless a new application is filed with and approved by the APCO.

### **a. N-2149-0-2: Facility-Wide Requirements**

- Condition 6 on the requirements for the proposed permit complies with this rule.

## **8. District Rule 2040 – Applications**

The purpose of this rule is to explain the procedures for filing, denying, and appealing the denial of applications for an Authority to Construct or a Permit to Operate.

a. N-2149-0-2: Facility-Wide Requirements

- Condition 7 on the requirements for the proposed permit complies with this rule.

**9. District Rule 2070 – Standards for Granting Applications**

The purpose of this rule is to explain the standards by which an APCO may deny an application for an Authority to Construct or Permit to Operate. Any source operation must be constructed and operated in accordance with Rule 2201 (New and Modified Stationary Source Review Rule), Rule 4001 (New Source Performance Standards), and Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), the Authority to Construct, and the Permit to Operate.

a. N-2149-0-2: Facility-Wide Requirements

- Condition 5 on the requirements for the proposed permit complies with this rule.

**10. District Rule 2080 – Conditional Approval**

The purpose of this rule is to grant authority to the APCO to issue or revise specific written conditions on an Authority to Construct or a Permit to Operate to assure compliance with air contaminant emission standards or limitations.

a. N-2149-0-2: Facility-Wide Requirements

- Condition 5 on the requirements for the proposed permit complies with this rule.

**11. District Rule 2201 - New and Modified Stationary Source Review Rule**

The permit units were subject to the District Rule 2201 upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- a. N-2149-1-3: POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7500 SCFM
  - Condition 2 from the current PTO has been included as condition 39 on the facility wide requirements.
  - Conditions 1 and 3 through 11 on the current PTO have been included as conditions 1 through 10 of the requirements for the proposed permit.
- b. N-2149-2-7: 11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER
  - Conditions 1 through 3 from the current PTO have been included as conditions 22, 39, and 40 on the facility wide requirements.
  - Conditions 4 through 39 from the current PTO have been included as conditions 1 through 36 on the requirements for the proposed permit. The dryer annual heat input limit calculation clarified to be calculated on a 12-month rolling basis.
- c. N-2149-3-7: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM
  - Conditions 2 through 4 from the current PTO have been included as conditions 22, 39, and 40 on the facility wide requirements.
  - Conditions 1 and 5 through 23 from the current PTO have been included as conditions 1 through 20 of the requirements for the proposed permit.
- d. N-2149-4-7: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER.
  - Conditions 2 through 4 from the current PTO have been included as conditions 22, 39, and 40 on the facility wide requirements.

- Conditions 1 and 5 through 23 from the current PTO have been included as conditions 1 through 20 of the requirements for the proposed permit.
- e. N-2149-5-4: 31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS
- Conditions 1 through 3 from the current PTO have been included as conditions 22, 39, and 40 on the facility wide requirements.
  - Conditions 4 through 37 from the current PTO have been included as conditions 1 through 34 of the requirements for the proposed permit.
- f. N-2149-6-2: POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE
- Condition 1 from the current PTO have been included as condition 39 on the facility wide requirements.
  - Conditions 2 through 13 from the current PTO have been included as conditions 1 through 12 of the requirements for the proposed permit.
- g. N-2149-7-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR
- Conditions 2, 4, and 5 from the current PTO have been included as conditions 22, 39, and 40 on the facility wide requirements.
  - Conditions 1, 3, and 6 through 15 from the current PTO have been included as conditions 1 through 12 of the requirements for the proposed permit.
- h. N-2149-8-1: DRY MILK BLENDING OPERATION CONSISTS TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY DONALDSON MODEL 2DF12 DUST COLLECTOR
- Conditions 1 and 2 from the current PTO have been included as conditions 39 and 40 on the facility wide requirements.

- Conditions 3 through 12 from the current PTO have been included as conditions 1 through 10 of the requirements for the proposed permit.

## **12. District Rule 2520, Federally Mandated Operating Permits**

The purpose of this rule is to provide for the following: An administrative mechanism for issuing operating permits for new and modified sources of air contaminants in accordance with requirements of 40 CFR Part 70. An administrative mechanism for issuing renewed operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70. An administrative mechanism for revising, reopening, revoking, and terminating operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70. An administrative mechanism for incorporating requirements authorized by preconstruction permits issued under District Rule 2201 (New and Modified Stationary Source Review) in a Part 70 permit as administrative amendments, provided that such permits meet procedural requirements substantially equivalent to the requirements of 40 CFR 70.7 and 70.8, and compliance requirements substantially equivalent to those contained in 40 CFR 70.6. The applicable federal and local requirements to appear on a single permit.

Section 5.2 requires permittees submit applications for Title V permit renewal at least six months prior to permit expiration.

### **a. N-2149-0-2: Facility-Wide Requirements**

- Condition 37 on the requirements for the proposed permit complies with this rule.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

Section 9.1.1 of District Rule 2520 requires all conditions on Title V permits specify a reference of the origin of an authority for each term or condition, and identify any difference in form as compared to the applicable requirements upon which the term or condition is based.

Section 9.4 contains requirements to incorporate all applicable recordkeeping requirements into the Title V permit. This section also specifies records of any required monitoring and support data be kept for a period of five years.

b. N-2149-0-2: Facility-Wide Requirements

- Conditions 8 and 9 on the requirements for the proposed permit comply with this rule.

Section 9.5 requires the submittal of monitoring reports at least every six months. Prompt reporting of deviations from permitting requirements, including those attributable to upset conditions is also required. The responsible official must certify all required reports.

c. N-2149-0-2: Facility-Wide Requirements

- Conditions 10 and 11 on the requirements for the proposed permit comply with this rule.

Section 9.7 states that the Title V permit must also contain a severability clause in case of a court challenge.

d. N-2149-0-2: Facility-Wide Requirements

- Condition 12 on the requirements for the proposed permit complies with this rule.

Section 9.8 contains requirements for provisions in the Title V permit stating 1) the permittee must comply with all permit conditions; 2) the permitted activity should not be reduced in order to comply with the permit conditions. Further, this reasoning shall not be used as a defense in an enforcement action, 3) the permit may be revoked, modified, reissued, or reopened for cause, 4) the Title V permit does not reflect any property rights, and 5) the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit.

e. N-2149-0-2: Facility-Wide Requirements

- Conditions 5 and 13 through 16 on the requirements for the proposed permit comply with this rule.

Section 9.9 requires the permit specify that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120.

f. N-2149-0-2: Facility-Wide Requirements

- Condition 17 on the requirements for the proposed permit complies with this rule.

Section 9.13.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA contain a certification by a responsible official as to truth, accuracy, and completeness.

g. N-2149-0-2: Facility-Wide Requirements

- Condition 26 on the requirements for the proposed permit complies with this rule.

Section 9.13.2 contains inspection and entry requirements that allows an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements.

h. N-2149-0-2: Facility-Wide Requirements

- Conditions 18, 19, 20, and 21 on the requirements for the proposed permit comply with this rule.

Section 9.16 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District).

i. N-2149-0-2: Facility-Wide Requirements

- Condition 36 on the requirements for the proposed permit complies with this rule.

Section 10.0 requires any application form, report, or compliance certification submitted pursuant to these regulations shall contain certification of truth, accuracy, and completeness by a responsible official.

j. N-2149-0-2: Facility-Wide Requirements

- Condition 26 on the requirements for the proposed permit complies with this rule.

### Greenhouse Gas Requirements

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

### **13. District Rule 4101 – Visible Emissions**

The purpose of this rule is to prohibit the emissions of visible air contaminants to the atmosphere. Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

#### a. N-2149-0-2: Facility-Wide Requirements

- Condition 22 on the requirements for the proposed permit complies with this rule.

### **14. District Rule 4201 – Particulate Matter Concentration**

The purpose of this rule is to protect the ambient air quality by establishing a particulate matter emission standard. Section 3.1 requires emissions to be at or below 0.1 grains of particulate matter per dry standard cubic foot of exhaust gas.

#### Diesel-Fired IC Engines:

For diesel-fired emergency standby IC engines, the results from source tests of the engines generally indicate emission rates from these units are less than the allowable limit of 0.1 grain/dscf. Of the tests available at the time of this writing, most were in the range of 0.042 to 0.061 grain/dscf, with a low of 0.020 grain/dscf, and a high of 0.092 grain/dscf. However, although the above testing is sufficient to assume that IC engines comply with the 0.1 grain/dscf limit, the data is insufficient to prove compliance in all cases. There is an exemption from source testing for "Nonutility distillate-oil-fueled emergency piston-type IC engines." Per the CAPCOA/CARB/EPA IX Title V Periodic Monitoring Recommendations memo, dated July 2001, the District's grain loading limit of 0.1 grain/dscf does not need to be source tested as long as the following conditions are required in the Permit to Operate:

- 1) Engine usage is limited to maintenance, testing, and time of actual unforeseen emergencies.
- 2) Usage for maintenance and testing is not to exceed 200 hours per year (the emergency standby diesel-fired engines in this facility are limited to less than or equal to 50 hours per year for maintenance and testing).
- 3) Maintain records of all engine usage and maintenance.
  - a. N-2149-7-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR
    - Conditions 5, 6, and 8 on the requirements for this permit unit assure compliance with this rule.

Gaseous Fired Units:

The following calculations, using AP-42 emission factors for natural gas, demonstrate that the emission of PM during the firing of gaseous fuels complies with the limits of the rule.

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate. Therefore, the following calculations use an uncorrected F factor to represent worst-case emissions.

$$\left( \frac{13.7 \text{ lb PM}}{10^6 \text{ ft}^3} \right) \left( \frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left( \frac{1 \text{ MMBtu}}{8710 \text{ dscf}} \right) \left( \frac{7000 \text{ grain}}{1 \text{ lb}} \right) = \left( \frac{0.01 \text{ grain}}{\text{dscf}} \right) < \left( \frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$$13.7 \frac{\text{lb PM}}{10^6 \text{ cf}} = \text{sum of filterable and condensable uncontrolled emission factors for natural gas-fired boilers (AP42, Table 1.4-2)}$$

$$\frac{900 \text{ Btu}}{1 \text{ scf}} = \text{the minimum expected higher heating value of natural gas (AP42, Table 1.4.1)}$$

$$\frac{8710 \text{ dscf}}{1 \text{ MMBtu}} = \text{F factor, Fd, for natural gas at 0\% O}_2 \text{ (40CFR60, App. A, Table 19-1)}$$

$$\frac{10,610 \text{ wscf}}{1 \text{ MMBtu}} = \text{F factor, Fw, for natural gas at 0\% O}_2 \text{ (40CFR60, App. A, Table 19-1)}$$

$$\frac{7000 \text{ grain}}{1 \text{ lb}} = \text{conversion factor (AP-42, Appendix A)}$$

a. N-2149-0-2: Facility-Wide Requirements

- Condition 40 on the requirements for the proposed permit applies to all gaseous-fired units in this facility and complies with this rule.

**15. District Rule 4305, Boilers, Steam Generators and Process Heaters – Phase 2**

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from boilers, steam generators, and process heaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour.

Since emissions limits of District Rule 4306 and all other requirements are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4306 requirements as shown in the following section will satisfy requirements of District Rule 4305.

**16. District Rule 4306, Boilers, Steam Generators and Process Heaters – Phase 3**

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from boilers, steam generators, and process heaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour.

a. N-2149-3-7: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM

- Conditions 3, 6 through 10, 12, 13, 15 through 18, and 20 on the requirements for this permit unit assure compliance with this rule.

b. N-2149-4-7: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER

- Conditions 3, 6 through 10, 12, 13, 15 through 18, and 20 on the requirements for this permit unit assure compliance with this rule.

## **17. District Rule 4309 – Dryers, Dehydrators, and Ovens**

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) 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.

- a. N-2149-2-7: 11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER
  - Conditions 1, 17, 18, 20 through 23, 26 through 31, and 36 on the requirements for this permit unit assure compliance with this rule.
- b. N-2149-5-4: 31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS
  - Conditions 17 through 22, 25 through 30, and 34 on the requirements for this permit unit assure compliance with this rule.

## **18. District Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr**

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from boilers, steam generators, and process heaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour.

The purpose of this rule is to limit the emissions of oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO), oxides of sulfur (SO<sub>2</sub>), and particulate matter 10 microns or less (PM<sub>10</sub>) from boilers, steam generators, and process heaters.

Section 5.1 states that operators of a unit(s) shall comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis:

Section 5.1.1 requires the unit comply with the emission limits specified in Sections 5.2 and 5.4; or

Section 5.1.2, Pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4; or

Section 5.1.3, Comply with the applicable Low-use Unit requirements of Section 5.5.

Per Section 6.4.1, the operator submitted to the District an Emissions Control Plan containing the compliance schedule required by Section 7.0 of the rule. In the compliance plan, the facility chose to comply with Section 5.1.1 of this rule which is to comply with the emission limits specified in Sections 5.2 and 5.4.

Section 5.4 states the particulate matter control requirements.

5.4.1 To limit particulate matter emissions, an operator shall comply with one of the following requirements:

5.4.1.1 On and after the applicable NO<sub>x</sub> Compliance Deadline specified in Section 5.2 Table 1, operators shall fire units exclusively on PUC-quality natural gas, commercial propane, butane, or liquefied petroleum gas, or a combination of such gases;

5.4.1.2 On and after the applicable NO<sub>x</sub> Compliance Deadline specified in Section 5.2 Table 1, operators shall limit fuel sulfur content to no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet; or

5.4.1.3 On and after the applicable NO<sub>x</sub> Compliance Deadline specified in Section 5.2 Table 1, operators shall install and properly operate an emission control system that reduces SO<sub>2</sub> emissions by at least 95% by weight; or limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% O<sub>2</sub>.

The facility will comply with the requirements of Section 5.4 by firing on PUC regulated natural gas unless there is a natural gas curtailment, in which, the facility will fire on propane.

a. N-2149-3-7: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM

- Condition 3, 6 through 13, 15 through 18, and 20 on the requirements for this permit unit assure compliance with this rule.

b. N-2149-4-7: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER

- Conditions 3, 6 through 13, 15 through 18, and 20 on the requirements for this permit unit assure compliance with this rule.

#### **19. District Rule 4601 – Architectural Coatings**

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). This rule further specifies labeling requirements, coatings thinning recommendations and storage requirements.

a. N-2149-0-2: Facility-Wide Requirements

- Conditions 23, 24, and 25 on the requirements for the proposed permit comply with this rule.

#### **20. District Rule 4701, Internal Combustion Engines–Phase 1**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. Except as provided in Section 4.0, the provisions of this rule apply to any internal combustion engine, rated greater than 50 bhp that requires a Permit to Operate (PTO).

There is one diesel-fired IC engine involved with this project. Pursuant to Section 2.0 of District Rule 4701, these engines are subject to District Rule 4701–*Internal Combustion Engines–Phase 1*. In addition, the engine is also subject to District Rule 4702–*Internal Combustion Engines–Phase 2*.

Since the emissions limits of District Rule 4702 and all other requirements are equivalent or more stringent than District Rule 4701 requirements,

compliance with 4702 rule requirements will satisfy requirements of District Rule 4701 and no further discussion is required.

## **21. District Rule 4702, Internal Combustion Engines–Phase 2**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. Except as provided in Section 4.0, the provisions of this rule apply to any internal combustion engine, rated greater than 25 bhp that requires a Permit to Operate (PTO).

Section 4.2.1 states that except for the requirements of Section 5.9 and Section 6.2.3, the requirements of this rule shall not apply to emergency standby IC engine or a low-use engine, and provided that it is operated with a properly maintained and operated nonresettable elapsed operating time meter, or an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO.

Section 5.9.1 states that engines subject to Section 4.2 shall comply with the requirements specified in Section 5.9.2 through 5.9.5.

- 5.9.2 Properly operate and maintain each engine as recommended by the engine manufacturer or emission control supplier system.
- 5.9.3 Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control supplier.
- 5.9.4 Install and operate a nonresettable elapsed time meter, or an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA. The operator shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

Section 6.2.3 states that an operator claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request. The records shall include, but are not limited to, the following: total hours of operation, type of fuel used, the purpose for operating the engine, for emergency standby engines – all hours of non-emergency and emergency operation shall be reported, and other support documentation necessary to demonstrate claim to the exemption.

The facility operates one IC engine that operates as an emergency standby engine, as defined in Rule 4702. The following conditions will ensure that the engine meets the requirements of emergency standby engines as defined in the rule.

- a. N-2149-7-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR
  - Conditions 1, 6 through 12 on the requirements for this permit unit assure compliance with this rule.

**22. District Rule 8011, 8021, 8031, 8041, 8051, 8061, and 8071 – SJVUAPCD Regulation VIII - Fugitive Dust (PM10)**

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources, including construction, demolition, excavation, extraction, mining activities, outdoor storage piles, paved and unpaved roads.

- a. N-2149-0-2: Facility-Wide Requirements
  - Conditions 29 through 34 on the requirements for the proposed permit comply with these rules.

**23. 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units**

This subpart applies to each steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr.

- a. N-2149-3-7: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM
  - Condition 21 on the requirements for this permit unit assures compliance with this rule.

b. N-2149-4-7: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER

- Condition 21 on the requirements for this permit unit assures compliance with this rule.

**24. 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

This provisions of this subpart are applicable to owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commence construction after July 11, 2005 where the stationary CI ICE are manufactured as a certified National Fire Protection Association fire pump engine July 1, 2006.

a. N-2149-7-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

- This engine was installed prior to July 11, 2005 and manufactured prior to July 1, 2006. Therefore this engine is not subject to this subpart.

**25. 40 CFR 61, Subpart M – National Emission Standard for Asbestos**

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures.

a. N-2149-0-2: Facility-Wide Requirements

- Condition 35 on the requirements for the proposed permit complies with this rule.

**26. 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes

requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§63.6585 states an owner or operator is subject to this subpart if it owns or operates a stationary RICE at a major or area source of HAP emissions.

§63.6585(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year.

§63.6585(c) An area source of HAP emissions is a source that is not a major source.

- This facility is an area source of HAP emissions since it is not a major source of HAP per §63.6585(b).

§63.6590(a)(1)(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

- Permit unit N-2149-7 is an existing stationary RICE since it commenced construction before June 12, 2006.

§63.6595(a)(1) An existing stationary CI RICE located at an area source of HAP emissions must comply with the applicable emission limitations and operating limitations no later than May 3, 2013.

§63.6603(a) An existing stationary RICE located at an area source of HAP emissions must comply with the applicable requirements in Table 2d to this subpart.

**Table 2d to Subpart ZZZZ of Part 63— Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions**

As stated in §§63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each	You must meet the following requirement, except during periods of startup	During periods of startup you must
4. Emergency stationary CI RICE	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>1</sup> b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

§63.6625(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

§63.6640(f)(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.

§63.6655(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

a. N-2149-7-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

- Conditions 1, 8, and 11 through 18 on the requirements for this permit unit assure compliance with this rule.

**27. 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)**

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

<b>Pollutant</b>	<b>Major Source Threshold (lb/year)</b>
VOC	20,000
NO <sub>x</sub>	20,000
CO	200,000
PM <sub>10</sub>	140,000
SO <sub>x</sub>	140,000

a. N-2149-1-3: POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7500 SCFM

This permit may be subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> emission limit of 0.0045 lb-PM<sub>10</sub>/ton of product. The permit unit has an add-on control for PM<sub>10</sub> with the use of a dust collector. Assuming a 99% dust collector efficiency and a permitted product throughput of 200 ton/day, the following calculation shows the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year. Therefore, this unit is not subject to CAM for PM<sub>10</sub>.

$$\begin{aligned} \text{Pre-control PM}_{10} &= (0.0045 \text{ lb-PM}_{10}/\text{ton-product} \times 200 \text{ ton-product/day} \times 365 \text{ day/yr}) \div (1-0.99) \\ &= \mathbf{32,850 \text{ lb-PM}_{10}/\text{yr} < 140,000 \text{ lb-PM}_{10}/\text{yr}} \end{aligned}$$

- b. N-2149-2-7: 11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER

This permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC due to the combustion of natural gas or LPG but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This permit may be subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> emission limit of 0.348 lb-PM<sub>10</sub>/ton of dry milk powder. The permit unit has an add-on control for PM<sub>10</sub> with the use of a wet scrubber. Assuming a 90% wet scrubber efficiency and a permitted dry milk powder daily throughput of 106.6 ton/day, the following calculation shows the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year. Therefore, this unit is not subject to CAM for PM<sub>10</sub>.

$$\begin{aligned} \text{Pre-control PM}_{10} &= (0.348 \text{ lb-PM}_{10}/\text{ton-dry milk} \times 106.6 \text{ ton-dry} \\ &\quad \text{milk/day} \times 365 \text{ day/yr}) \div (1-0.90) \\ &= \mathbf{135,403 \text{ lb-PM}_{10}/\text{yr} < 140,000 \text{ lb-PM}_{10}/\text{yr}} \end{aligned}$$

- c. N-2149-3-7: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM

The boiler is equipped with a low NO<sub>x</sub> burner (LNB) with flue gas recirculation (FGR) and emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. The unit is not subject to CAM for SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC since it does not have add-on controls for these criteria pollutants. It may be subject to CAM for NO<sub>x</sub> since it has an FGR system that is an add-on control for NO<sub>x</sub>. The following calculations will determine if the pre-control potential to emit will be greater than the major source threshold for NO<sub>x</sub> (20,000 lb/yr).

The boiler is currently operating in compliance with Rule 4320 and therefore is required to meet the NO<sub>x</sub> emissions limit of 0.0085 lb/MMBtu (7 ppmv @3%O<sub>2</sub>). To assess whether CAM is triggered the emissions factor corresponding to pre add-on (FGR) is calculated.

AP-42 Table 1.4-1 (7/98) lists the following emissions factors for small boilers < 100 MMBtu/hr

	Emissions Factor (lb/10 <sup>6</sup> scf)
Uncontrolled	100
Controlled – low NOx burners	50
Controlled – Low NOx burners/FGR	32

The control efficiency of FGR and corresponding emissions factor without FGR are

$$100 \times (50 - 32)/50 = 36\%$$

$$0.0085 / (1 - 0.36) = 0.013 \text{ lb/MMbtu}$$

and the pre add-on control emissions are

$$0.013 \text{ lb/MMbtu} \times 60.6 \text{ MMBtu/hr} \times 8760 \text{ hr/yr}$$

$$= \mathbf{6,901 \text{ lb-NO}_x/\text{yr} < 20,000 \text{ lb-NO}_x/\text{yr}}$$

Therefore, the boiler is not subject to CAM.

- d. N-2149-4-7: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER.

The boiler is equipped with a low NO<sub>x</sub> burner (LNB) with flue gas recirculation (FGR) and emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. The unit is not subject to CAM for SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC since it does not have add-on controls for these criteria pollutants. It may be subject to CAM for NO<sub>x</sub> since it has an FGR system that is an add-on control for NO<sub>x</sub>. The following calculations will determine if the pre-control potential to emit will be greater than the major source threshold for NO<sub>x</sub> (20,000 lb/yr).

The boiler is currently operating in compliance with Rule 4320 and therefore is required to meet the NO<sub>x</sub> emissions limit of 0.0085 lb/MMBtu (7 ppmv @3%O<sub>2</sub>). To assess whether CAM is triggered the emissions factor corresponding to pre add-on (FGR) is calculated.

AP-42 Table 1.4-1 (7/98) lists the following emissions factors for small boilers < 100 MMBtu/hr

	Emissions Factor (lb/10 <sup>6</sup> scf)
Uncontrolled	100
Controlled – low NOx burners	50
Controlled – Low NOx burners/FGR	32

The control efficiency of FGR and corresponding emissions factor without FGR are

$$100 \times (50 - 32)/50 = 36\%$$

$$0.0085 / (1 - 0.36) = 0.013 \text{ lb/MMbtu}$$

and the pre add-on control emissions are

$$0.013 \text{ lb/MMbtu} \times 60.7 \text{ MMBtu/hr} \times 8760 \text{ hr/yr}$$

$$= \mathbf{6,912 \text{ lb-NO}_x/\text{yr} < 20,000 \text{ lb-NO}_x/\text{yr}}$$

Therefore, the boiler is not subject to CAM.

- e. N-2149-5-4: 31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS

This permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC due to the combustion of natural gas or LPG but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This permit may be subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> emission limit of 0.141 lb-PM<sub>10</sub>/ton of dry milk powder. The permit unit has an add-on control for PM<sub>10</sub> with the use of two dust collectors. Assuming a 99% dust collector efficiency and a permitted dry milk powder daily throughput of 228 ton/day, the following calculation shows the pre-control PM<sub>10</sub> potential to emit is greater than the major source threshold of 140,000 lb-PM<sub>10</sub>/year. Therefore, this unit is subject to CAM for PM<sub>10</sub>.

$$\begin{aligned}\text{Pre-control PM}_{10} &= (0.141 \text{ lb-PM}_{10}/\text{ton- dry milk} \times 228 \text{ ton-dry} \\ &\text{milk/day} \times 365 \text{ day/yr}) \div (1-0.99) \\ &= \mathbf{1,173,402 \text{ lb-PM}_{10}/\text{yr} > 140,000 \text{ lb-PM}_{10}/\text{yr}}\end{aligned}$$

$$\begin{aligned}\text{Post-control PM}_{10} &= (0.141 \text{ lb-PM}_{10}/\text{ton- dry milk} \times 228 \text{ ton-dry} \\ &\text{milk/day} \times 365 \text{ day/yr}) \\ &= \mathbf{11,734 \text{ lb-PM}_{10}/\text{yr} < 140,000 \text{ lb-PM}_{10}/\text{yr}}\end{aligned}$$

Since the post control PM emissions are less than 140,000 lb-PM<sub>10</sub>/yr the daily monitoring visible inspection complies with the minimum monitoring frequency as required by this rule.

CAM compliance requires a daily visible emissions inspection in conjunction with daily monitoring of the pressure differential gauge and is satisfied by monitoring and recordkeeping of differential operating pressure and evaluating visible emissions using EPA method 22. The condition for differential pressure range of 0.0 to 5.0 inches of water column is placed on the draft permit based on manufacturer's recommendation. The requirements for corrective action to eliminate visible emissions within 24 hours and also, for excursion from the acceptable range will assure CAM compliance.

- Conditions 2, and 35 through 41 on the requirements for the proposed permit comply with this rule.

f. N-2149-6-2: POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

This permit may be subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> emission limit of 0.0045 lb-PM<sub>10</sub>/ton of product. The permit unit has an add-on control for PM<sub>10</sub> with the use of a dust collector. Assuming a 99% dust collector efficiency and a permitted product throughput of 444.4 ton/day, the following calculation shows the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year. Therefore, this unit is not subject to CAM for PM<sub>10</sub>.

$$\begin{aligned}\text{Pre-control PM}_{10} &= (0.0045 \text{ lb-PM}_{10}/\text{ton-product} \times 444.4 \text{ ton-} \\ &\text{product/day} \times 365 \text{ day/yr}) \div (1-0.99) \\ &= \mathbf{72,993 \text{ lb-PM}_{10}/\text{yr} < 140,000 \text{ lb-PM}_{10}/\text{yr}}\end{aligned}$$

- g. N-2149-7-2: 2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

This permit unit has emissions limits for NO<sub>x</sub> and PM<sub>10</sub> but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub> and PM<sub>10</sub>.

- h. N-2149-8-1: DRY MILK BLENDING OPERATION CONSISTS TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY DONALDSON MODEL 2DF12 DUST COLLECTOR

This permit may be subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> emission limit of 0.00022 lb-PM<sub>10</sub>/ton of product. The permit unit has an add-on control for PM<sub>10</sub> with the use of a dust collector. Assuming a 99% dust collector efficiency and a permitted product throughput of 72 ton/day, the following calculation shows the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year. Therefore, this unit is not subject to CAM for PM<sub>10</sub>.

$$\begin{aligned} \text{Pre-control PM}_{10} &= (0.00022 \text{ lb-PM}_{10}/\text{ton-product} \times 72 \text{ ton-product/day} \times 365 \text{ day/yr}) \div (1-0.99) \\ &= 578 \text{ lb-PM}_{10}/\text{yr} < 140,000 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

## 28. 40 CFR Part 82, Subpart B and F – Stratospheric Ozone

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers, and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC).

- a. N-2149-0-2: Facility-Wide Requirements
- Conditions 27 and 28 on the requirements for the proposed permit comply with this rule.

## X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit

California Dairies, Inc..  
Facility #N-2149  
Project #1110109

is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

**A. Requirements Addressed by Model General Permit Templates**

The applicant does not propose to use any model general permit templates.

**XI. PERMIT CONDITIONS**

See final operating permit beginning on the following page.



# Permit to Operate

**FACILITY:** N-2149

**EXPIRATION DATE:** 11/30/2016

**LEGAL OWNER OR OPERATOR:** CALIFORNIA DAIRIES, INC.  
**MAILING ADDRESS:** 2000 N PLAZA DR  
VISALIA, CA 93291-9358

**FACILITY LOCATION:** 475 S TEGNER RD  
TURLOCK, CA 95380

**FACILITY DESCRIPTION:** MILK PROCESSING

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Seyed Sadredin**  
Executive Director / APCO

**David Warner**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

**FACILITY:** N-2149-0-2

**EXPIRATION DATE:** 11/30/2016

## **FACILITY-WIDE REQUIREMENTS**

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: CALIFORNIA DAIRIES, INC.

Location: 475 S TEGNER RD, TURLOCK, CA 95380

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10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
40. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
41. On August 31, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [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:** N-2149-1-3

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7500 SCFM

## PERMIT UNIT REQUIREMENTS

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1. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of product bagged shall not exceed 400,000 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
9. A daily log shall be maintained and shall include the total weight of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and Stanislaus County Rule 107] Federally Enforceable Through Title V Permit
11. 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
12. 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:** N-2149-2-7

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER

## PERMIT UNIT REQUIREMENTS

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1. The dryer shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
2. The dryer shall be equipped with a totalizing fuel flow meter which measures the quantity of natural gas consumed per day (in cubic feet). [District Rule 2201] Federally Enforceable Through Title V Permit
3. The wet scrubber sprays and/or nozzles shall be maintained in optimum working order. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All ducting from the drying operations to the wet scrubber shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heat input to the dryer shall not exceed 207 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The heat input to the dryer shall not exceed 70,445 MMBtu/year, calculated on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of powdered milk produced shall not exceed 106.6 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The NOx emissions due to the combustion of natural gas shall not exceed 3.5 ppmv @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CO emissions due to the combustion of natural gas shall not exceed 11.37 ppmv @ 19% O<sub>2</sub> (equivalent to 0.084 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The SOx emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The PM10 emissions from the drying operation shall not exceed 0.348 lb/ton of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The combined PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] 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.

16. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
18. 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
19. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted using EPA Method 5, or CARB 501/501A or any other District and EPA approved test method. [District Rule 2201] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. 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
23. 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
24. 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
25. 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
26. 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
27. 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
28. 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.

29. 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
30. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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
31. Permittee shall maintain records which demonstrate the dryer is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
32. The permittee shall maintain a daily record, in MMBtu, of the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records on a 12-month rolling basis, in MMBtu, the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The permittee shall maintain a daily record, in pounds, of the quantity of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Records of the combined daily quantity of PM<sub>10</sub> emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
36. 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2149-3-7

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM.

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0085 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
4. The total PM<sub>10</sub> emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the cumulative daily quantity of PM<sub>10</sub> emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, 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 show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] 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.

9. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] 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 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. 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
15. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. 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 Rules 4305, 4306 and 4320] 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 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, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The owner or operator shall record and maintain records of the amount of fuel combusted during each operating day. [40 CFR 60.48c(g)(1)] 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:** N-2149-4-7

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER.

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0085 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
4. The total PM<sub>10</sub> emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the cumulative daily quantity of PM<sub>10</sub> emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, 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 show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] 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.

9. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] 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 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. 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
15. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. 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 Rules 4305, 4306 and 4320] 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 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, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The owner or operator shall record and maintain records of the amount of fuel combusted during each operating day. [40 CFR 60.48c(g)(1)] 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:** N-2149-5-4

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS

## PERMIT UNIT REQUIREMENTS

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1. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Each baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from each baghouse serving the drying operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting from the drying operations to the baghouses shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The dryer shall only be fired on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The quantity of powdered milk produced shall not exceed 228 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The NO<sub>x</sub> emissions due to the combustion of natural gas shall not exceed 4.81 ppmv @ 19% O<sub>2</sub> (equivalent to 0.055 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The CO emissions due to the combustion of natural gas shall not exceed 8.26 ppmv @ 19% O<sub>2</sub> (equivalent to 0.061 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The SO<sub>x</sub> emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The PM<sub>10</sub> emissions from the dryer baghouses shall not exceed 0.141 lb/ton of powdered milk processed. [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.

15. The combined PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. 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
18. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
19. 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
20. 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
21. 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
22. 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
23. 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
24. 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
25. 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
26. 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
27. 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.

28. 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
29. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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
30. 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
31. Records of the daily quantity of powdered milk produced shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Records of the combined daily quantity of PM<sub>10</sub> emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. The baghouse shall operate at all times with a minimum differential pressure of 0.0 inches water column and a maximum differential pressure of 5.0 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. 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
37. 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
38. 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
39. 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
40. 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
41. 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. [District Rule 2520 and 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:** N-2149-6-2

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of product bagged shall not exceed 444.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emission concentration shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Records of the daily quantity of powder milk bagged shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Records of the cumulative daily quantity of PM10 emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The total PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
13. 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
14. 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:** N-2149-7-2

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6625] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. Emissions shall not exceed any of the following: 6.9 g-NOx/bhp-hr; 1.4 g-CO/bhp-hr; or 1.0 g-VOC/bhp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed 0.4 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
7. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
8. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 21 hours per calendar year. [District Rules 2201 and 4702, and 40 CFR 63.6640 (f)(ii)] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
10. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] 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.

11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), records of operational characteristics monitoring, and the sulfur content of the diesel fuel used. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6655(a)(2) and (a)(5)] Federally Enforceable Through Title V Permit
12. 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 4702, 17 CCR 93115, and 40 CFR 63.6660] Federally Enforceable Through Title V Permit
13. On and after May 3, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)] Federally Enforceable Through Title V Permit
14. On and after May 3, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63.6585/63.6595 (a)] Federally Enforceable Through Title V Permit
15. On and after May 3, 2013, the engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63.6603/63.6640 Table 2d, Row 4.a] Federally Enforceable Through Title V Permit
16. On and after May 3, 2013, the engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603/63.6640 Table 2d, Row 4.b] Federally Enforceable Through Title V Permit
17. On and after May 3, 2013, the engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603/63.6640 Table 2d, Row 4.c] Federally Enforceable Through Title V Permit
18. On and after May 3, 2013, the permittee shall keep records of the maintenance conducted on the engine. [40 CFR 63.6655(e)] 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:** N-2149-8-1

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

DRY MILK BLENDING OPERATION CONSISTS TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY DONALDSON MODEL 2DF12 DUST COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The dust collector 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
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of dry milk processed shall not exceed 72 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.00022 pounds per ton of the dry milk processed. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Daily records of the quantity of dry milk processed, in tons, shall be kept on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070] Federally Enforceable Through Title V Permit
11. 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
12. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# Attachment A

## Detailed Permit Listing

**Detailed Facility Report**  
For Facility=2149 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

CALIFORNIA DAIRIES, INC. 475 S TEGNER RD TURLOCK, CA 95380	FAC # STATUS: TELEPHONE:	N 2149 A	TYPE: TOXIC ID:	TitleV	EXPIRE ON: AREA: INSP. DATE:	11/30/2016 6 / 04/13
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2149-1-3	64.5 HP	3020-01 C	1	197.00	197.00	A	POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7500 SCFM
N-2149-2-7	11.2 MMBtu/hr dryer	3020-02 G	1	815.00	815.00	A	11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER
N-2149-3-7	60.6 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM.
N-2149-4-7	60.7 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER.
N-2149-5-4	31.5 MMBtu/hr dryer	3020-02 H	1	1,030.00	1,030.00	A	31.5 MMBTU/HR NIRO MODEL CD1 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS
N-2149-6-2	72 HP	3020-01 C	1	197.00	197.00	A	POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE
N-2149-7-2	2,220 bhp	3020-10 F	1	749.00	749.00	A	2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR
N-2149-8-1	105 hp electric motors	3020-01 D	1	314.00	314.00	A	DRY MILK BLENDING OPERATION CONSISTS TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY DONALDSON MODEL 2DF12 DUST COLLECTOR

Number of Facilities Reported: 1

# Attachment B

## Exempt Equipment

**San Joaquin Valley  
Unified Air Pollution Control District  
Title V Application - INSIGNIFICANT ACTIVITIES**

COMPANY NAME: California Dairies (Turlock)

FACILITY ID: N-2149

Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.

Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1		Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Piston-type i.c.engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2		Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251	6.7.1.1	
Space heating equipment other than boilers	6.1.4	√	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers + +	6.2		Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft <sup>2</sup> open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		Brazing, soldering, or welding equipment	6.10	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	
Containers used to store clean produced water	6.6.1		Fugitive emissions sources assoc. with exempt equipment	6.12	
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2		Pits and Ponds as defined in Rule 1020	6.15	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store org-anic material where the actual storage temperature < 150 F	6.6.4		Emissions less than 2 lb/day from units not included above	6.19	
Containers used to store unheated organic material with an initial boiling point ≥ 302 F	6.6.5		Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7	√	Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

# Attachment C

## Previous District PTO

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2149-1-1

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7500 SCFM

## PERMIT UNIT REQUIREMENTS

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1. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. There shall be no visible emissions from the baghouse. [District Rule 2201]
7. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201]
8. The quantity of product bagged shall not exceed 400,000 pounds in any one day. [District Rule 2201]
9. PM10 emissions shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201]
10. A daily log shall be maintained and shall include the total weight of product bagged. [District Rule 2201]
11. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070]

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-2-6

EXPIRATION DATE: 11/30/2016

**EQUIPMENT DESCRIPTION:**

11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. The dryer shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309]
5. The dryer shall be equipped with a totalizing fuel flow meter which measures the quantity of natural gas consumed per day (in cubic feet). [District Rule 2201]
6. The wet scrubber sprays and/or nozzles shall be maintained in optimum working order. [District Rule 2201]
7. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201]
8. All ducting from the drying operations to the wet scrubber shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201]
9. The heat input to the dryer shall not exceed 207 MMBtu in any one day. [District Rule 2201]
10. The heat input to the dryer shall not exceed 70,445 MMBtu in any one calander year. [District Rule 2201]
11. The quantity of powdered milk produced shall not exceed 106.6 tons in any one day. [District Rule 2201]
12. The NOx emissions due to the combustion of natural gas shall not exceed 3.5 ppmv @ 19% O2. [District Rule 2201]
13. The CO emissions due to the combustion of natural gas shall not exceed 11.37 ppmv @ 19% O2 (equivalent to 0.084 lb/MMBtu). [District Rule 2201]
14. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
15. The SOx emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
16. The PM10 emissions from the drying operation shall not exceed 0.348 lb/ton of powdered milk produced. [District Rule 2201]
17. The combined PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201]
18. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]
19. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted at least once every twelve months. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

20. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
21. 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]
22. Source testing to measure PM<sub>10</sub> emissions from the scrubber exhaust gas shall be conducted using EPA Method 5, or CARB 501/501A or any other District approved test method. [District Rule 2201]
23. 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]
24. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
26. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
27. 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]
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
29. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309]
30. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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]
31. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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]
32. 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]

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

33. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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]
34. Permittee shall maintain records which demonstrate the dryer is fired exclusively on PUC quality natural gas. [District Rule 4309]
35. The permittee shall maintain a daily record, in MMBtu, of the quantity of natural gas consumed. [District Rule 2201]
36. The permittee shall maintain a cumulative annual record, on a calendar year basis, in MMBtu, of the quantity of natural gas consumed. [District Rule 2201]
37. The permittee shall maintain a daily record, in pounds, of the quantity of powdered milk produced. [District Rule 2201]
38. Records of the combined daily quantity of PM<sub>10</sub> emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201]
39. 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]

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-3-6

EXPIRATION DATE: 11/30/2016

## EQUIPMENT DESCRIPTION:

60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM.

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0085 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
7. The total PM<sub>10</sub> emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69 pounds in any one day. [District Rule 2201]
8. The permittee shall maintain records of the cumulative daily quantity of PM<sub>10</sub> emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201]
9. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320]
10. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, 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 show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
11. 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320]
13. 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 4306. [District Rules 4305, 4306 and 4320]
14. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
15. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320]
16. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
17. 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]
18. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]
19. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
20. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
21. 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 Rules 4305, 4306 and 4320]
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
23. 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, 4305, 4306 and 4320]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2149-4-6

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER.

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0085 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
7. The total PM<sub>10</sub> emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69 pounds in any one day. [District Rule 2201]
8. The permittee shall maintain records of the cumulative daily quantity of PM<sub>10</sub> emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201]
9. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320]
10. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, 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 show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
11. 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320]
13. 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 4306. [District Rules 4305, 4306 and 4320]
14. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
15. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320]
16. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
17. 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]
18. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]
19. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
20. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
21. 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 Rules 4305, 4306 and 4320]
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
23. 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, 4305, 4306 and 4320]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2149-5-3

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
5. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201]
6. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
7. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201]
8. Each baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
9. Visible emissions from each baghouse serving the drying operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
10. All ducting from the drying operations to the baghouses shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201]
11. The dryer shall only be fired on PUC quality natural gas. [District Rule 2201]
12. The quantity of powdered milk produced shall not exceed 228 tons in any one day. [District Rule 2201]
13. The NO<sub>x</sub> emissions due to the combustion of natural gas shall not exceed 4.81 ppmv @ 19% O<sub>2</sub> (equivalent to 0.055 lb/MMBtu). [District Rule 2201]
14. The CO emissions due to the combustion of natural gas shall not exceed 8.26 ppmv @ 19% O<sub>2</sub> (equivalent to 0.061 lb/MMBtu). [District Rule 2201]
15. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
16. The SO<sub>x</sub> emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
17. The PM<sub>10</sub> emissions from the dryer baghouses shall not exceed 0.141 lb/ton of powdered milk processed. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

18. The combined PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69 pounds in any one day. [District Rule 2201]
19. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
20. 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]
21. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
22. 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]
23. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
25. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
26. 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]
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
28. 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]
29. 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]
30. 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]
31. 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]

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

32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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]
33. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309]
34. Records of the daily quantity of powdered milk produced shall be maintained. [District Rule 2201]
35. Records of the combined daily quantity of PM<sub>10</sub> emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201]
36. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201]
37. 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]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2149-6-0

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
3. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. There shall be no visible emissions from the baghouse. [District Rule 2201]
7. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201]
8. The quantity of product bagged shall not exceed 444.4 tons in any one day. [District Rule 2201]
9. PM10 emission concentration shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201]
10. Records of the daily quantity of powder milk bagged shall be maintained. [District Rule 2201]
11. Records of the cumulative daily quantity of PM10 emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall be maintained. [District Rule 2201]
12. The total PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69 pounds in any one day. [District Rule 2201]
13. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070]

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

Facility Name: CALIFORNIA DAIRIES, INC.

Location: 475 S TEGNER RD, TURLOCK, CA 95380

N-2149-6-0: Jul 25 2012 11:39AM - SIONGCOJ

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2149-7-0

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

2,220 BHP CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]
7. Emissions shall not exceed any of the following: 6.9 g-NOx/bhp-hr; 1.4 g-CO/bhp-hr; or 1.0 g-VOC/bhp-hr. [District Rule 2201]
8. Emissions from this IC engine shall not exceed 0.4 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
10. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
11. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 21 hours per calendar year. [District Rules 2201 and 4702]
12. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
13. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), records of operational characteristics monitoring, and the sulfur content of the diesel fuel used. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 2201 and 4702 and 17 CCR 93115]
15. 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 4702 and 17 CCR 93115]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2149-8-0

**EXPIRATION DATE:** 11/30/2016

**EQUIPMENT DESCRIPTION:**

DRY MILK BLENDING OPERATION CONSISTS TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY DONALDSON MODEL 2DF12 DUST COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
4. The dust collector 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]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
6. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
7. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201]
9. The quantity of dry milk processed shall not exceed 72 tons in any one day. [District Rule 2201]
10. PM10 emissions shall not exceed 0.00022 pounds per ton of the dry milk processed. [District Rule 2201]
11. Daily records of the quantity of dry milk processed, in tons, shall be kept on the premises at all times. [District Rule 2201]
12. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070]

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

# Attachment D

## EPA Comments/District Response

## **EPA Comments**

EPA submitted public comments regarding the District's analysis and preliminary decision of California Dairies, Inc Initial Title V Permit. A copy of the July 24, 2012 email letter containing these comments is available at the District.

### **EPA Comments:**

The bag house permits are subject to VE requirements pursuant to the Facility wide permit, but no requirements to monitor the baghouses, at least periodically for VE. CAPCOA, EPA and ARB have worked out some guidance on appropriate monitoring for VE sources depending on the size.

On permit unit N-2197-2-7, Condition 7 provides an annual fuel usage limit, based on calendar year, and Condition 33 requires a cumulative annual record, on a calendar year basis, of the quantity of NG consumed. To be an enforceable limit, this limit must be on a 12-month rolling basis, not on a calendar year basis.

On permit unit N-2197-2-7, condition 19 lists source testing methods for PM10. The language "any other District approved method" is not acceptable, EPA approval is also required if not approved into the underlying SIP rule or permit. It should read, "any other District and EPA approved test method."

On permit unit N-2197-3-7 and N-2197-4-7, condition 21 requires records of the daily amount of fuel combusted, but I see no fuel usage limit in the permit. How are annual emissions limited?

On permit unit N-2197-8-1, the dust collector is subject to a 5% VE requirement, but I did not see any requirement to to monitor the baghouses, at least periodically for VE. CAPCOA, EPA and ARB have worked out some guidance on appropriate monitoring for VE sources depending on the size.

Also, while on page 4, a proper analysis is provided showing that District Rule 1070 ensures compliance with the Stanislaus County SIP Rule 107, Rule 107 is never cited as the basis of any permit conditions. (See permit unit N-2197-1-3, condition 10.) Since Condition 10 ensures compliance with both District rule 1070 and SIP rule 107, both rules must be listed as the basis for the permit condition.

**District Response:**

Baghouse in permits N-2149-1-3, N-2149-6-2, and N-2149-8-1:

*In order to comply with the VE requirements pursuant to the Facility-Wide permit condition #22, the following VE monitoring and recordkeeping conditions are added to the permits to ensure the baghouses compliance with District Rule 4101 VE requirement.*

*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]*

*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]*

Permit Unit N-2149-2-7, Condition 7:

*Conditions 7 and 33 are revised to change calendar basis to 12-month rolling basis.*

Permit Unit N-2149-2-7, Condition 19:

*Condition is revised to state "any other District and EPA approved test method."*

Permit Unit N-2149-3-7 and N-2149-4-7, Condition 21:

*Permit unit N-2149-3 and N-2149-4 are boilers subject to 40 CFR 60 Subpart Dc. Condition 21 on both permits complies with §60.48c(g)(1) that requires the owner or operator record and maintain records of the amount of fuel combusted during each operating day. In addition, there are no fuel usage limits on the permits since the emissions for the two boilers were determined under Proj #N-1091449 as operating continuously, 24 hr/day and 8760 hour/year.*

Permit Unit N-2149-8-1, Condition 1:

*VE monitoring and recordkeeping requirements as stated above are added to the permit to assure compliance with VE requirement of condition 1.*

District Rule 1070 and Stanislaus County SIP Rule 107

*Include reference to Stanislaus County SIP Rule 107 to permit with conditions referencing District Rule 1070.*