



NOV 06 2012

Torrey Cook
Post Foods, LLC
901 E. Whitmore Ave
Modesto, CA 95358

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-1933
Project # N-1111927**

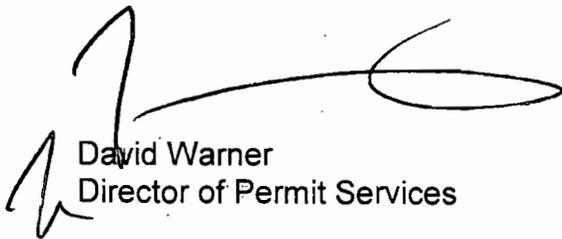
Dear Ms. Cook:

Enclosed for your review and comment is the District's analysis of Post's application for the Federally Mandated Operating Permit for its cereal manufacturing operation at 901 E Whitmore Ave, Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Rupī Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services

cc: Jagmeet Kahlon, Permit Services Engineer

Attachments

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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Bakersfield, CA 93308-9725
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NOV 06 2012

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

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-1933
Project # N-1111927**

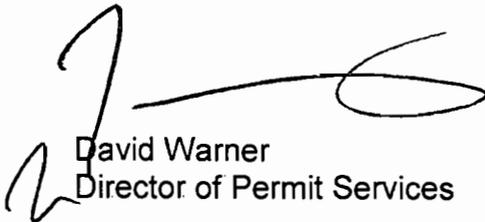
Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Post's application for the Federally Mandated Operating Permit for its cereal manufacturing operation at 901 E Whitmore Ave, Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services

cc: Jagmeet Kahlon, Permit Services Engineer

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NOV 06 2012

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

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District Facility # N-1933
Project # N-1111927**

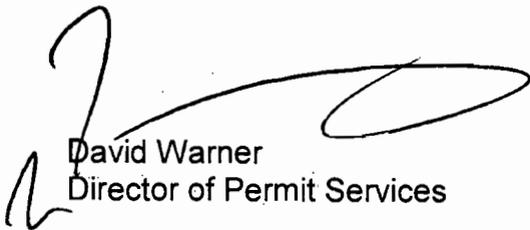
Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Post's application for the Federally Mandated Operating Permit for its cereal manufacturing operation at 901 E Whitmore Ave, Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

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Modesto Bee

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
FEDERALLY MANDATED OPERATING PERMITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to Post Foods, LLC for its cereal manufacturing operation at 901 E Whitmore Ave, Modesto, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1111927, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356-8718.

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

Proposed Initial TV Engineering Evaluation

**Post Foods, LLC
N-1933**

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TITLE V APPLICATION REVIEW

Engineer: Jagmeet Kahlon
Date: October 31, 2012

Facility Number: N-1933
Facility Name: Post Foods, LLC
Mailing Address: 901 E Whitmore Ave
Modesto, CA 95358-9408

Contact Name: Torrey Cook
Phone: (209) 541-3401

Responsible Official: Steve Schonhoff
Title: Vice President of Operations

Project # : N-1111927
Deemed Complete: June 22, 2011

I. PROPOSAL

Post Foods, LLC submitted a permit application for an initial Title V permit for its existing cereal manufacturing plant in Modesto, California. The application was submitted in June, 2011, as the facility is a Major Source for VOC emissions. Since that time, the facility has obtained Authorities to Construct (ATCs) to install a regenerative thermal oxidizer (RTO) to reduce VOC emissions from cereal flavor coating reels, finished flake cereal dryer, grape nut baking oven, and grape nut dryers. These ATCs are not implemented into Permits to Operate (PTO) since the source testing required by these permits has not been completed yet. Source testing is tentatively scheduled to start the week of December 3, 2012 and will be completed by the end of week of December 10, 2012. The source testing report is due within 60 days after completing the test. The source testing results may reveal that the facility is no longer a Major Source for VOC emissions. If this turns out to be the case, the facility may submit a Title V permit modification application to cancel the Title V permit. Otherwise, the facility will be required to submit a separate permit application(s) to amend the ATCs issued for the RTO to remove (or amend) the facility-wide VOC and NO_x requirements and incorporate the amended ATCs into the Title V permit.

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

Post Foods, LLC is located at 901 E Whitmore Ave, Modesto, California.

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 has requested to utilize model general umbrella template 0-3.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

As discussed above, the applicant has requested to utilize general umbrella template 0-3. Permit conditions associated with the use of umbrella template 0-3 are not subject to further EPA and public review.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

The applicant has proposed the use of general umbrella template 0-3 (4/27/10). The following applicable requirements are addressed by general umbrella template 0-3.

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 December 20, 2007)

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

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

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

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

District Rule 2520, Federally Mandated Operating Permits
(Amended June 21, 2001) Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1,
9.13.2, 9.16, and 10.0

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

District Rule 4601, Architectural Coatings
(Amended December 17, 2009)

District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Construction, Demolition, Excavation, and Extraction Activities
(Amended August 19, 2004)

District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Handling and Storage of Bulk Materials
(Amended August 19, 2004)

District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Carryout and Trackout
(Amended August 19, 2004)

District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Open Areas
(Amended August 19, 2004)

District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Paved and Unpaved Roads
(Amended August 19, 2004)

District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Unpaved Vehicle/Equipment Areas
(Amended September 16, 2004)

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

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

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

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

District Rule 1080, Stack Monitoring
(Amended December 17, 1992)

District Rule 1081, Source Sampling
(Amended December 16, 1993)

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

District Rule 2520, Federally Mandated Operating Permits
(Amended June 21, 2001) Sections not addressed by Umbrella Template

District Rule 4001, New Source Performance Standards
(Amended April 14, 1999)

40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
(Amended February 16, 2012)

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

District Rule 4202, Particulate Matter – Emission Rate
(Amended December 17, 1992)

District Rule 4301, Fuel Burning Equipment
(Amended December 17, 1992)

District Rule 4304, Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters
(Adopted October 19, 1995)

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
(Adopted October 16, 2008)

District Rule 4351, Boilers, Steam Generators and Process Heaters – Phase 1
(Amended August 21, 2003)

District Rule 4693, Bakery Ovens
(Adopted May 16, 2002)

District Rule 4801, Sulfur Compounds
(Amended December 17, 1992)

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

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 rule that is not currently federally enforceable:

District Rule 4102, Nuisance
(Amended December 17, 1992)

For this facility, condition 41 of the requirements for facility wide permit N-1933-0-1 is based on the rule listed above and is not Federally Enforceable through Title V permit.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-3 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 40 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

District Rule 1070, Inspections

This rule requires that the 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. Further, the District has the authority to require recordkeeping, to make inspections and to conduct tests of air pollution sources.

Generally, Title V sources are inspected on a periodic basis at least once every 12 months to ensure compliance with the applicable rules and regulations. The permits to operate will include all necessary recordkeeping requirements. Thus, compliance is expected with this rule.

District Rule 1080, Stack Monitoring

This rule grants the APCO authority to request the installation, use, maintenance, and inspection of continuous monitoring equipment. This rule also specifies the performance standards for the equipment and administrative recordkeeping, reporting, and violation and equipment breakdown notification requirements.

This rule does not require installation of continuous monitoring equipment, i.e. CEMS or COMS type equipment for the units at cereal manufacturing facility. Therefore, no specific conditions are included in the permits as part of this project.

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. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

Periodic sampling sources at this facility include: boilers and dryers for which NO_x, CO and O₂ concentrations measurements are required to determine compliance with the daily emissions limit. These sources are presumed to be equipped adequate accessible ports to collect samples since these sources had been tested more than once in the past. The following table summarizes the condition(s) enforces compliance with this rule.

Permit #	Conditions
N-1933-3-8	26, 27
N-1933-4-3	--
N-7488-19-6, '20-5	15, 20, 26

Note that the facility has obtained Authorities to Construct (ATCs) to install a regenerative thermal oxidizer (RTO) to reduce VOC emissions from cereal flavor coating reels, finished flake cereal dryer, grape nut baking oven, and grape nut dryers covered under permits N-1933-3 and '4. These ATCs are not implemented into Permits to Operate (PTO) since the source testing required by these permits has not been completed yet. Source testing is tentatively scheduled to start the week of December 3, 2012 and will be completed by the end of week of December 10, 2012. The source testing report is due within 60 days after completing the test. The source testing results may reveal that the facility is no longer a Major Source for VOC emissions. If this turns out to be the case, the facility may submit a Title V permit modification application to cancel the Title V permit. Otherwise, the facility will be required to submit a separate permit application(s) to amend the ATCs issued for the RTO to remove (or amend) the facility-wide VOC and NO_x requirements and incorporate the amended ATCs into the Title V permit.

District Rule 2201, New and Modified Stationary Source Review Rule

Permits to Operate (PTO) N-1933-1-1, '-2-1, '-3-6, '-4-1, '-5-0, '-6-5, '-7-3, '-12-0, '-15-1, '-16-0, '-19-5, '-20-4, '-21-1 and '-26-0 were subject to District's NSR Rule (Rule 2201) at least once prior to the preparation of this Title V document. The NSR conditions included in these permits are now federally-enforceable through the Title V permit per guidance in the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995. The following table summarizes permit number, NSR conditions in the PTO and NSR conditions in the Title V being issued as part of this project.

Permit #	NSR conditions in PTO	NSR conditions in Title V
N-1933-1	1 to 10	1, 2, 4 to 8, 10 to 12
N-1933-2	2, 6 to 12	2, 7 to 11, 13, 14
N-1933-3	4 to 20, 22, 34	2 to 18, 21, 33
N-1933-4	1 to 8, 10	1 to 8, 10
N-1933-5	1 to 3	2 to 4
N-1933-6	1 to 18	2 to 18
N-1933-7	1 to 5, 7 to 10	1 to 4, 6, 8 to 11
N-1933-12	1 to 4, 7 to 10, 12 to 14	1 to 4, 7 to 10, 13 to 15
N-1933-15	1 to 7	2, 4 to 7, 9, 10
N-1933-16	1 to 4	1, 3 to 5
N-1933-19, '-20	1, 3, 5 to 9	1, 3, 5 to 9
N-1933-21	1 to 11	1 to 3, 5 to 9, 11 to 13
N-1933-26	1 to 5	1 to 3, 6, 7

District Rule 2520, Federally Mandated Operating Permits

Except for the discussion below, the proposed use of a facility-wide template SJV-UM-0-3 covers the requirements of this Rule.

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

District Rule 4001, New Source Performance Standards

Review of the applicable NSPS is as follows:

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

This subpart applies to steam generating units that are constructed, reconstructed, or modified after 6/9/89 and have a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. Subpart Dc has standards for SO_x and PM₁₀.

This facility has two 29.92 MMBtu/hr (each) natural gas-fired boilers that were constructed sometimes in 1994, long after the cut-off date of 6/9/89. Therefore, these units are subject to this subpart. These boilers are covered under permits N-1933-19 and '-20.

60.42c – Standards for sulfur dioxide

Since coal is not combusted in the boilers, the requirements of this section are not applicable.

60.43c – Standards for particulate matter

The boilers are not fired on coal, combusts mixtures of coal with other fuels, combusts wood, combusts mixture of wood with other fuels, or oil; therefore they are not subject to the requirements of this section.

60.44c – Compliance and performance tests methods and procedures for sulfur dioxide

The boilers are not subject to the sulfur dioxide requirements of this subpart. Therefore, this section is not applicable.

60.45c – Compliance and performance test methods and procedures for particulate matter

The boilers are not subject to the particulate matter requirements of this subpart. Therefore, this section is not applicable.

60.46c – Emission monitoring for sulfur dioxide

The boilers are not subject to the sulfur dioxide requirements of this subpart. Therefore, this section is not applicable.

60.47c – Emission monitoring for particulate matter

The boilers are not subject to the particulate matter requirements of this subpart. Therefore, this section is not applicable.

60.48c – Reporting and recordingkeeping requirements

Section 60.48c (a) states that the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

The design heat input capacity and type of fuel combusted is listed in the equipment description of each boiler permit. Thus, continued compliance is expected.

- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel mixture of fuels under §60.42c or §40.43c.

This requirement is not applicable since the boilers are not subject to §60.42c or §60.43c.

- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

The facility has not proposed annual capacity factor for the boilers; therefore one will not be required.

- (4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator

This requirement is not applicable since the boilers are not equipped with an emerging technology used to control SO₂ emissions.

Section 60.48c(g) states that the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. Conditions 4 and 25 in the boiler permits ensure continued compliance with this section.

Section 60.48c(i) states that all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

District Rule 4305, 4306, and 4320 requires that all records shall be kept for a period of at least five years from the date each record is entered in a log book. Condition 28 in the boiler permits ensure continued compliance with this section.

District Rule 4201, Particulate Matter Concentration

Section 3.0 prohibits the release or discharge into the atmosphere from any single source operation, dust, fumes, or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions, as determined by the test methods in section 4.0. The following table summarizes conditions that ensure compliance with this Rule.

Permit #	Conditions
N-1933-1	3
N-1933-2	6
N-1933-3	1
N-1933-4	9
N-1933-5	1
N-1933-6	1
N-1933-7	5
N-1933-12	12
N-1933-15	1
N-1933-16	2
N-1933-19, '-20	2
N-1933-21	4
N-1933-26	5

District Rule 4202, Particulate Matter Emission Rate

This rule limits the hourly particulate matter emissions from each Source Operation to the result of the equation that is applicable.

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

$$E_{Max} = 17.31 P^{0.16}, \text{ where } P > 30 \text{ tons/hr}$$

Where, E_{max} = Maximum allowable emissions in lb/hr
P = Process weight in tons/hr

The following table summarizes conditions that ensure compliance with this Rule.

Permit #	Conditions
N-1933-1	16
N-1933-2	19
N-1933-3	37
N-1933-4	15
N-1933-5	9
N-1933-6	24
N-1933-7	15
N-1933-12	20
N-1933-15	15
N-1933-16	10
N-1933-19, '-20	Rule does not apply
N-1933-21	17
N-1933-26	12

District Rule 4301, Fuel Burning Equipment

This Rule limits emissions from fuel burning equipment, which is defined as equipment used to burn fuel for the primary purpose of producing heat or power by indirect heat transfer. Section 4.1 provides an exemption for air pollution control equipment.

This rule is applicable to the boilers under permit N-1933-19 and '-20. The requirements of section 5.0 are as follows:

- Combustion contaminants (TSP) - Not to exceed 0.1 gr/dscf @ 12% CO₂ and 10 lb/hr
- SO_x emissions - Not to exceed 200 lb/hr
- NO_x emissions - Not to exceed 140 lb/hr

$$PM \left(\frac{\text{gr}}{\text{dscf}} \right) = \frac{PM \text{ Emissions} \left(\frac{\text{lb} - PM}{\text{MMBtu}} \right) \left(7,000 \frac{\text{gr} - PM}{\text{lb} - PM} \right)}{F_{\text{Factor} - \text{CO}_2} \left(\frac{\text{dscf}}{\text{MMBtu}} \right) \left(\frac{100\%}{12\%} \right)}$$

Where, $F_{\text{Factor} - \text{CO}_2}$ for gaseous fuels at 60 °F is 1,024 dscf/MMBtu (from EPA Method 19).

EF _{PM10} (lb/MMBtu)	Fuel Type	PM Conc. (gr/dscf)	PM (lb/hr)	SO _x (lb/hr)	NO _x (lb/hr)
0.0076	Natural Gas	0.0062	0.2	0.1	0.2

The proposed emissions from each unit are within the limits of this Rule and compliance is expected.

District Rule 4304, Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters

Pursuant to District Rules 4305 and 4306, Section 6.3.1, boilers are required to be tested at least once every 12-months. Gaseous fuel fired units demonstrating compliance on two consecutive 12-month source tests may defer the following source test for up to 36 months. During 36-month source testing interval, the operator shall tune the boiler according to section 5.2.1 (tune up at least once each calendar year by qualified technician in accordance with Rule 4304). Tune-ups required by Sections 5.2.1 and 6.3.1 do not need to be performed for units that operate and maintain an APCO approved CEMS or an APCO approved Alternate Monitoring System where the applicable emission limits are periodically monitored.

This facility determines flue gas recirculation (FGR) rate on a weekly basis and compares it with the FGR rate established in the latest source testing to ensure continued compliance with the permitted NO_x and CO emissions. They do not take direct measurement of NO_x and CO concentrations on a periodic basis. Therefore, these units are required to be tuned up during 36 month-interval in which source testing is not required. Conditions 12 and 27 are included in the boiler permits to ensure compliance with this rule.

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

This rule is applicable to the boilers operating under permits N-1933-19 and -20.

Since the emission limits of District Rule 4306 and all other requirements (monitoring, testing and recordkeeping) are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4306 requirements will satisfy requirements of District Rule 4305.

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

This rule is applicable to the boilers operating under permits N-1933-19 and N-1933-20.

Section 2.0 - Applicability

This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a total rated heat input greater than 5 million Btu per hour. Each boiler is rated at 29.92 MMBtu/hr; therefore, this rule applies.

Section 5.0 - Requirements

Section 5.1.1 limits NO_x and CO emissions to 9 ppmvd @ 3% O₂ and 400 ppmvd @ 3% O₂ respectively. Conditions 5 and 8 in the boiler permits ensure continued compliance with this section.

Section 5.2 lists the requirements for boilers limited to a heat input rate of less than 9 billion Btu per calendar year. The boilers are not limited to a heat input rate of less than 9 billion Btu per calendar year. Therefore, this section is not applicable to these units.

Section 5.3 states that the NO_x and CO emission limits shall not apply to this unit during start-up and shutdown period provided that the duration of each start-up or each shutdown is not greater than 2.0 hours, and the emission control system is utilized during these periods. These boilers are expected to achieve permitted level of NO_x and CO within few minutes of startup. Therefore, startup/shutdown conditions are not included in these permits.

Section 5.4.1 requires the operator to install and maintain a non-resettable, totalizing mass or volumetric flow meter for the units, which simultaneously uses gaseous and liquid fuels and is subject to the requirements of Section 5.1. The boilers are exclusively fired on gaseous fuel. Therefore, they are not required to install and maintain a fuel flow meter due to this section.

Section 5.4.2 requires the operator to install and maintain an operational APCO approved Continuous Emissions Monitoring System (CEMS) for NO_x, CO, and oxygen, or implement an APCO-approved Alternate Monitoring System. An APCO approved CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13 (except subsection h), 40 CFR Part 60 Appendix B (Performance Specifications) and 40 CFR Part 60 Appendix F (Quality Assurance Procedures), and applicable provisions of Rule 1080 (Stack Monitoring).

This facility determine FGR rate on a weekly basis and compare it with the values established during the latest source test to ensure continued compliance with permitted NO_x and CO emission limits. This monitoring scheme satisfies the requirements of this section. Conditions 21 to 24 in the boiler permits ensure continued compliance with this section.

Section 5.5.1 states the operator of any unit have the option of complying with either the applicable heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limit. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling). Condition 10 in the boiler permits ensure continued compliance with this section.

Section 5.5.2 requires 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. Condition 14 in the boiler permits ensure continued compliance with this section.

Section 5.5.3 requires that all CEM data shall be averaged over a period of 15-consecutive minutes to demonstrate compliance with the applicable emission limits in this rule. The boilers are not equipped with CEMS system; therefore, no further discussion is necessary. The facility has chosen another approved monitoring scheme to ensure compliance with NO_x and CO emission limits.

Section 5.5.4 requires emissions monitoring pursuant to Sections 5.4.2, 5.4.2.1, and 6.3.1 using a portable NO_x analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five readings evenly spaced out over the 15-consecutive-minute period. The facility has chosen another approved monitoring scheme to ensure compliance with NO_x and CO emission limits. Therefore, no further discussion is necessary

Section 5.5.5 requires that for emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, 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. Condition 13 in the boiler permits ensure continued compliance with this section.

Section 6.0 – Administrative Requirements

The records required by Sections 6.1.1 through 6.1.3 shall be maintained for five calendar years and shall be made available to the APCO upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule. Condition 28 in the boiler permits ensure continued compliance with this section.

Section 6.2 identifies the test methods for determining higher heating value of fuel, NO_x, CO, O₂, stack gas velocities, and stack gas moisture content. Conditions 16 to 18 in the boiler permits ensure continued compliance with this section.

Section 6.3.1 requires that this unit be tested to determine compliance with the applicable requirements of section 5.1 and 5.2.3 not less than once every 12 months. Units that demonstrate compliance on two consecutive 12-month source tests may defer the following 12-month source test for up to 36 months (no more than 30 days before or after the required 36-month source test date). During the 36-month source testing interval, the operator shall tune the unit in accordance with the provisions of Section 5.2.1, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer to ensure compliance with the applicable emission limits specified in Sections 5.1 or 5.2.3. Tune-ups required by Sections 5.2.1 and 6.3.1 do not need to be performed for units that operate and maintain an APCO approved CEMS or an APCO approved Alternate Monitoring System where the applicable emission limits are periodically monitored. Conditions 11 and 12 in the boiler permits ensure continued compliance with this section. Since the applicant is already measuring FGR rate on weekly basis to ensure compliance with NO_x and CO emission limits, no other operational characteristics of the unit are required to be monitored.

Section 6.3.2 lists compliance testing procedure for units that represent a group of units. Group testing was not proposed or considered during previous permitting actions; therefore, no further discussion is required.

Section 6.4 discusses emission control plan (ECP). No ECP is due at this time. Therefore, continued compliance is expected with this section.

Section 7.0 – Compliance Schedule

The boilers are in full compliance of this Rule.

Compliance is expected with this Rule.

District Rule 4309, Dryers, Dehydrators, and Ovens

Section 2.0 - Applicability

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.

The Aeroglide and Roto-louvre dryers are each rated at 8.0 MMBtu/hr. Therefore, these dryers are subject to the requirements in this rule. The dryers are listed in the bran flakes cereal processing operation under permit N-1933-3.

Section 5.0 – Requirements

Per section 5.2, Table 1,

NO_x: 4.3 ppmvd @ 19% O₂ for units operating at 19.0 vol. % O₂ or less;
4.3 ppmvd for units operating at measured O₂ concentration greater than 19 vol. % O₂

CO: 42 ppmvd @ 19% O₂ for units operating at 19.0 vol. % O₂ or less;
42 ppmvd for units operating at measured O₂ concentration greater than 19 vol. % O₂

Conditions 9, 12 and 28 in permit N-1933-3 ensure continued compliance with this section.

Section 5.3 has startup and shutdown provision of not to exceed 1 hour for each startup and each shutdown. The dryers are equipped with low-NO_x burners, and are expected to achieve permitted level of NO_x and CO within few minutes of startup. Therefore, startup/shutdown conditions are not included in these permits

Section 5.4.1 requires that the operator of any unit subject to the applicable emission limits in 4.3.3, or 5.2 shall monitor emissions using APO-approved CEMS for NO_x or install and maintain alternate monitoring method that meet the requirements in Section 5.4.1.2.1 through 5.4.1.2.3 of this Rule. The facility is using portable analyzer to determine NO_x, CO and O₂ concentrations on a monthly basis. This monitoring scheme complies with the requirements of this section. Conditions 29 to 32 in permit N-1933-3 ensure continued compliance with this section.

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

Section 5.5.2 requires that 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.

Condition 20 in permit N-1933-3 ensures continued compliance with sections 5.5.1 and 5.5.2 (above).

Section 5.5.5 states that for emissions monitoring pursuant to Section 5.4.1.2.2.1, emission readings shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five readings evenly spaced out over the 15-consecutive-minute period. Condition 31 in permit N-1933-3 ensures continued compliance with this section.

Section 5.5.6 states that for emissions source testing performed pursuant to Section 6.3.1 to determine compliance with an applicable emission limit of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the unit, even if the averaged emissions of all three test runs are less than the applicable limit. Condition 22 in permit N-1933-3 ensures continued compliance with this section.

Section 6.0 – Administrative Requirements

Section 6.1.2 requires the following records for the operators using an alternate emission monitoring system:

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

Condition 38 is included in permit N-1933-3 ensures continued compliance with this section. Note that no surrogate parameters are established for Aeroglide and Roto-louvre dryers; therefore, no records are required for such parameters.

Section 6.1.6 requires that all records shall be maintained for a period of 5 calendar years, shall be made available on-site during normal business hours, and shall be submitted to the APCO upon request. Condition 39 in permit N-1933-3 ensures continued compliance with this section.

Section 6.2 identifies the test methods for determining higher heating value of fuel, NO_x, CO, O₂, stack gas velocities, and stack gas moisture content. Conditions 23 to 25 in permit N-1933-3 ensure continued compliance with this section.

Section 6.3.2 requires that each unit shall be initially source tested to determine compliance with the applicable emission limits not later than the applicable full compliance schedule specified in Section 7.0. Thereafter, each unit subject to Section 5.2 emission limits shall be source tested at least once every 24 months. Units subject to Section 5.2 and operating less than 50 days per calendar year shall follow the source test frequency prescribed in Section 6.3.3.

The dryers are initially source tested and found to be in compliance the required NO_x and CO limits. Note that these dryers operate more than 50 days per calendar year. Therefore, source testing prescribed in section 6.3.3 is not considered. Condition 21 in permit N-1933-3 ensures continued compliance with this section.

Section 7.0 – Compliance Schedule

The dryers are operating in compliance with the rule. Therefore, no further discussion is necessary.

Compliance is expected with this Rule.

District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters greater than 5.0 MMBtu/hr

Section 2.0 - Applicability

Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a total rated heat input greater than 5 million Btu per hour. Each boiler is rated at 29.92 MMBtu/hr; therefore, this rule applies.

Section 5.0 – Requirements

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

- Operate the unit to comply with the emission limits specified in Sections 5.2 and 5.4; or
- 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
- Comply with the applicable Low-use Unit requirements of Section 5.5.

The facility had chosen to comply with the emission limits specified in Section 5.2 and 5.4. These limits are summarized below:

NO_x: 7 ppmvd @ 3% O₂

CO: 400 ppmvd @ 3% O₂

Particulate Matter: Use PUC-quality natural gas, commercial propane, butane, or LPG, or combination of such gases with fuel sulfur content of 5 grains/100 scf or less.

Conditions 3, 5 and 8 in the boiler permits ensure continued compliance with this section.

Section 5.6 states that the NO_x and CO emission limits shall not apply to this unit during start-up and shutdown period provided that the duration of each start-up or each shutdown is not greater than 2.0 hours, and the emission control system is utilized during these periods. These boilers are expected to achieve permitted level of NO_x and CO within few minutes of startup. Therefore, startup/shutdown conditions are not included in these permits.

Section 5.7 discusses monitoring provisions to comply with NO_x and CO limits. These provisions are similar to the provisions in Rule 4306 (discussed previously). Conditions 21 to 24 in the boiler permits enforce continued compliance with this section.

Section 5.7.6 requires the operator to provide annual fuel sulfur content analysis. Condition 26 in the boiler permits enforces continued compliance with this section.

Section 5.8 discusses compliance determination. The requirements in this section are similar to the requirements in Rule 4306 (discussed previously). Conditions 10, 13, and 14 in boiler permits ensure continued compliance with this section.

Section 6.0 – Administrative Requirements

Recordkeeping requirements of this Rule are similar to that of the Rule 4306. Conditions 24, 27 and 28 in the boiler permits ensure continued compliance with this section.

Section 6.2 identifies the test methods for determining higher heating value of fuel, NO_x, CO, O₂, stack gas velocities, stack gas moisture content, and SO_x test methods. Conditions 16, 17, 18 and 19 in boiler permits ensure compliance with this section. Note SO_x test method is included as part of this project.

Section 6.3 requires compliance testing of each unit subject to the requirements in Section 5.2 of the rule. The testing is similar to the one in Rule 4306. Condition 11 in boiler permits ensures continued compliance with this section.

Section 6.4 requires Emission Control Plan (ECP) for approval by no later than January 1, 2010. This date has long been passed. No new ECP is due at this time. Therefore, compliance is expected with this section.

Section 7.0 – Compliance Schedule

This section refers to “Authority to Construct” and “Compliance Deadline” dates. The compliance deadline has long been passed for these units. The recent source testing in June 2011 indicates that these units are operating in compliance with the requirements of this rule.

Compliance is expected with this Rule.

District Rule 4351, Boilers, Steam Generators and Process Heaters – Phase 1

Section 2.0 – Applicability

This rule applies to any boiler, steam generator or process heater, with a rated heat input greater than 5 million Btu per hour that is fired with gaseous and/or liquid fuels, and is included in a major NO_x source. This rule does not apply to any unit located west of Interstate Highway 5 located in Fresno, Kern, or Kings County.

This facility is not a Major NO_x source (defined in 3.11 of this Rule). Therefore, this rule is not applicable to the boilers at this facility.

District Rule 4693, Bakery Ovens

The requirements of this rule shall apply to bakery ovens operated at Major Source facilities, which emit VOCs during the baking of yeast-leavened products.

Section 3.1 defines "Bakery Oven" as an enclosed compartment supplied with heat, typically from the combustion of natural gas, used to bake bread, buns and rolls. This does not include proofing boxes.

The grape nut baking oven does not bake sellable bread, buns or rolls as an end product. It is used to make grape nut loafs, which is an intermediate part of the process in making grape nut cereal. Therefore, this oven is not subject to the requirements of this rule.

District Rule 4801, Sulfur Compounds

This rule is applicable to units that emit sulfur compounds. Units' subject to this rule includes:

- Dryers N-1933-3;
- Baking oven N-1933-4;
- Boilers under permits N-1933-19 and '-20;

District Rule 4801 was last amended on December 17, 1992, and has been submitted to the EPA to replace Stanislaus County Rule 407 in the SIP. This District Rule is at least stringent as the county rule, as demonstrated by the following comparison.

Comparison of District Rule 4801 and Stanislaus County Rule 407		
Requirement	Rule 4801	Rule 407
A person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

Dryers N-1933-3

Baking oven N-1933-4

Boilers under permits N-1933-19 and '-20

The above equipment uses natural gas. Therefore, at a reference state of 60 °F, the Rule 4801 limit of 2,000 ppmvd is equivalent to:

$$\frac{(2000 \text{ ppmvd}) \left(8,578 \frac{\text{dscf}}{\text{MMBtu}} \right) \left(64 \frac{\text{lb} - \text{SO}_x}{\text{lb} - \text{mol}} \right)}{\left(379.5 \frac{\text{dscf}}{\text{lb} - \text{mol}} \right) (10^6)} \cong 2.9 \frac{\text{lb} - \text{SO}_x}{\text{MMBtu}}$$

The permitted SO_x emissions based on 1.0 gr-S/100 scf of natural gas, which equates to 0.00285 lb/MMBtu. This permitted value is less than 2.9 lb-SO_x/MMBtu allowed by the rule; therefore, compliance is expected with this rule.

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

This section requires Compliance Assurance Monitoring (CAM) for units that meet the following criteria:

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

Pollutant	Major Source Threshold (lb/year)
VOC	20,000
NO _x	20,000
CO	200,000
PM ₁₀	140,000
SO _x	140,000

This facility is a Major Source for VOC emissions. Therefore, CAM is being evaluated for each pollutant.

**N-1933-1-2: BULK RECEIVING AND STORAGE OPERATIONS
CONSISTING OF TWO RECEIVING BINS (A AND B) SERVED BY A
PNEUMATIC RAILCAR UNLOADING SYSTEM, AND A TRUCK WHEAT
RECEIVING BIN SERVING 15 STORAGE SILOS VIA A PNEUMATIC
CONVEYING SYSTEM**

This permit has a PM₁₀ emissions limit. Furthermore, dust collectors are used to reduce PM emissions from the receiving operation. Therefore, CAM is being evaluated for this operation.

The dust collector control efficiency for particulate matter emissions is assumed to be 99%. The pre-control emissions from this operation will be estimated using the maximum processing rate, PM₁₀ emission factor and the control efficiency of the dust collector.

$$= (0.0008 \text{ lb-PM}_{10}/\text{ton of material-silo})(120 \text{ tons/day})(365 \text{ days/yr})/(1-0.99)$$
$$= 3,504 \text{ lb-PM}_{10}/\text{yr-silo}$$

Since the pre-control PM₁₀ emissions are less than the Major Source threshold for PM₁₀ from one silo, the material receiving and handling operation did not trigger CAM for PM₁₀.

N-1933-2-3: RAW GRAIN CLEANING AND PROCESSING OPERATION CONSISTING OF WHITE WHEAT PROCESSING, BARLEY PROCESSING, AND 15 STORAGE SILOS

This permit has a PM₁₀ limit for white wheat processing operation. Further, this operation is served by a dust collector. Therefore, CAM is being evaluated for this operation.

The dust collector control efficiency for particulate matter emissions is assumed to be 99%. The pre-control emissions from this operation are estimated using processing rate, PM₁₀ emission factor and control efficiency of the dust collector.

$$= (0.002 \text{ lb-PM}_{10}/\text{ton of grain processed})(150 \text{ tons/day})(365 \text{ days/yr})/(1-0.99)$$
$$= 10,950 \text{ lb-PM}_{10}/\text{yr}$$

Since the pre-control PM₁₀ emissions are less than the Major Source threshold for PM₁₀, the wheat processing operation did not trigger CAM for PM₁₀.

N-1933-3-8: BRAN FLAKES CEREAL PROCESSING OPERATION CONSISTING OF STORAGE BINS, BLENDERS, SIFTERS, MINOR INGREDIENT PNEUMATIC CONVEYING SYSTEM SERVED BY A PNEU-CON PNEUMATIC CONVEYING MODEL CP2000 DUST COLLECTOR, TWO STEAM HEATED COOKERS, ONE 8.0 MMBTU/HR NATURAL GAS FIRED ROTO-LOUVRE DRYER, FOUR CEREAL FLAKERS, TWO STEAM HEATED DRYERS, GRINDERS, SHAKERS, AND PACKAGING EQUIPMENT VENTED TO VARIOUS DUST COLLECTORS; FIVE COATING REELS VENTED TO ROTOCONE CENTRIFUGAL COLLECTORS; ONE 8.0 MMBTU/HR AEROGLIDE MODEL C1 120 66 RGC FINISHED FLAKES CEREAL DRYER AND COOLER VENTED TO A HORIZON SYSTEMS, INC. MODEL 4HE32 HIGH EFFICIENCY MULTICYCLONES IN PARALLEL AND ASSOCIATED CONVEYING EQUIPMENT.

Flake making operation:

This operation has a PM₁₀ emission limit and it is served by various dust collectors. Therefore, CAM is being evaluated for this operation.

The dust collectors are presumed to control at least 99% of the PM₁₀ emissions. The pre-control emissions from this operation are estimated using processing rate, PM₁₀ emission factor and control efficiency of the dust collector.

$$\begin{aligned} &= (0.012 \text{ lb-PM}_{10}/\text{ton of flakes})(190 \text{ tons/day})(365 \text{ days/yr})/(1-0.99) \\ &= 83,220 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the pre-control PM₁₀ emissions are less than the Major Source threshold for PM₁₀, this operation did not trigger CAM for PM₁₀.

8.0 MMBtu/hr natural gas-fired grit dryer (Roto-Louvre):

This unit is not equipped with an emission control equipment to reduce emissions from natural gas combustion. Therefore, CAM is not being evaluated for this unit.

Coating reels:

The coating reels have a PM₁₀ emission limit and they are served by wet centrifugal dust collectors. For calculations purpose, the control efficiency of the wet collectors is assumed to be 99%. The pre-control emissions from this operation are estimated using processing rate, PM₁₀ emission factor and control efficiency of the dust collector.

$$\begin{aligned} &= (0.01 \text{ lb-PM}_{10}/\text{ton of flakes})(180 \text{ tons/day})(365 \text{ days/yr})/(1-0.99) \\ &= 65,700 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the pre-control PM₁₀ emissions are less than the Major Source threshold for PM₁₀, these units did not trigger CAM for PM₁₀.

8.0 MMBtu/hr natural gas-fired finished food dryer (Aeroglide):

This unit is not equipped with an emission control equipment to reduce emissions from natural gas combustion. Therefore, CAM is not being evaluated for this unit.

"Minor Ingredient" material pneumatic conveying system:

This system has a PM₁₀ emission limit, and is served by a dust collector system. The dust collector is presumed to control at least 99% of the PM₁₀ emissions. The pre-control emissions from this operation are estimated using processing rate, PM₁₀ emission factor and control efficiency of the dust collector.

$$= (0.00034 \text{ lb-PM}_{10}/\text{ton of flakes})(11 \text{ tons/day})(365 \text{ days/yr})/(1-0.99)$$
$$= 137 \text{ lb-PM}_{10}/\text{yr}$$

Since the pre-control PM₁₀ emissions are less than the Major Source threshold for PM₁₀, the system did not trigger CAM for PM₁₀.

N-1933-4-3: GRAPE NUT PROCESS LINES 5, 9, 10, 11, AND 12 WITH A DIVERTER FROM THE GRAPE NUTS SURGE BIN TO DIVERT THE GRAPE NUTS TO THE PACKAGING LINE OR THE TACK SYSTEM (N-1933-21)

This permit does not contain any emission limit for the units covered under this permit. Therefore, CAM is not being evaluated for this permit unit.

N-1933-5-2: GRAPE NUT PROCESS LINES 13 AND 14 SERVED BY TWO GENERAL RESOURCES BAGHOUSES (THIRD AND FIFTH FLOORS)

This permit does not contain any emission limit for the units covered under this permit. Therefore, CAM is not being evaluated for this permit unit.

N-1933-6-7: GUN PUFFED PRODUCT PROCESSING OPERATION CONSISTING OF STORAGE BINS, BLENDERS, EXTRUDERS, ONE 1.2 MMBTU/HR NATURAL GAS-FIRED PELLET DRYER, ONE 0.5 MMBTU/HR NATURAL GAS-FIRED PELLET HEATER, ONE STEAM HEATED PUFFING GUN, ONE GUN PUFFED EXPANSION CHAMBER WITH A 1.0 MMBTU/HR NATURAL GAS-FIRED BURNER, PUFF BINS, FINISHED PRODUCT BINS, AND PACKAGING EQUIPMENT VENTED TO VARIOUS DUST COLLECTORS; TWO COATING REELS VENTED TO ROTOCONE CENTRIFUGAL COLLECTORS; TWO 3 MMBTU/HR NATURAL GAS-FIRED AEROGlide MODEL C1 45 63 RGC(E) PRE-SWEET PUFFED CEREAL DRYERS AND COOLER EACH VENTED TO A HORIZON SYSTEMS, INC. MODEL #2HE30 HIGH EFFICIENCY MULTICYCLONES IN PARALLEL

Sugar receiving operation:

This operation has a PM₁₀ emission limit, and is vented to a baghouse. Therefore, CAM is being evaluated for this operation. The pre-control emissions are estimated using permitted throughput and emission factors in addition to the 99% control efficiency of the baghouse for PM₁₀ emissions.

$$= (0.003 \text{ lb-PM}_{10}/\text{ton of sugar received})(14.6 \text{ tons/day})(365 \text{ days/yr})/(1-0.99)$$
$$= 1,599 \text{ lb-PM}_{10}/\text{yr}$$

Barley flour receiving operation:

This operation has a PM₁₀ emission limit, and is vented to a baghouse. Therefore, CAM is being evaluated for this operation. The pre-control emissions are estimated using permitted throughput and emission factors in addition to the 99% control efficiency of the baghouse for PM₁₀ emissions.

$$= (0.016 \text{ lb-PM}_{10}/\text{ton of sugar received})(20 \text{ tons/day})(365 \text{ days/yr})/(1-0.99)$$

$$= 11,680 \text{ lb-PM}_{10}/\text{yr}$$

One 1.2 MMBtu/hr pellet dryer:

One 0.5 MMBtu/hr pellet heater:

One 1.0 MMBtu/hr gun puffed expansion chamber:

These units do not contain any emissions limit for natural gas combustion. Therefore, CAM is not being evaluated for these units.

Cereal processing operation:

This permit contains a combined PM₁₀ emission limit for cereal processing, which appears to be established in 2002 under project N1021060. This limit include emissions from several operations including: Raw dry ingredients conveying and mixing, pellet drying, dried pellets conveyance to the puffing gun, puffing gun, puffing chamber, puffed cereal conveying to the coating reels, coating reels vented to rotoclones, finished puff drying, finished product conveying and packaging. Pre-control emissions from each unit are summarized in the table below:

Operation	Process Rate ^{1*} (tons/yr)	EF ² (uncontrolled) lb-PM/ton	PE _{pre-control} (lb-PM/yr)
Dry ingredients conveying and mixing	43,800	0.034	1,489
Pellet drying	43,800	0.72	31,536
Dried pellets conveyance to the puffing gun	43,800	0.034	1,489
Puffing gun	43,800	0.22	9,636
Puffing chamber	43,800	0.22	9,636
Puffed cereal to the coating reels	43,800	0.22	9,636
Coating reels vented to rotoclones	43,800	0.034	1,489
Finished puff drying	43,800	0.3	13,140
finished product conveying and packaging	43,800	0.0008	35

Pre-control PM₁₀ emissions from each unit are less than the Major Source threshold for PM₁₀. Therefore, these units did not trigger CAM for PM₁₀.

¹ Throughput = 120 tons/day (permitted limit) × 365 days/yr = 43,800 tons/yr;

² EF taken from the application review under project N1021060

N-1933-7-4: RECLAIM OPERATION CONSISTING OF ONE FEED HOPPER, ONE AUGER DIVERTER AND TWO GRINDERS VENTED TO A GENERAL RESOURCES MODEL 14030.6 BAGHOUSE; AND A PNEUMATIC CONVEYING SYSTEM SERVING SILO #1 VENTED TO A DCE MODEL C72HK BAGHOUSE

Grinding operation:

This operation has a PM₁₀ emission limit, and is vented to a baghouse. Therefore, CAM is being evaluated for this operation. The pre-control emissions are estimated using permitted throughput and emission factors in addition to the 99% control efficiency of the baghouse for PM₁₀ emissions.

$$\begin{aligned} &= (0.006 \text{ lb-PM}_{10}/\text{ton of sugar received})(75 \text{ tons/day})(365 \text{ days/yr})/(1-0.99) \\ &= 16,425 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Silo filling operation:

This operation has a PM₁₀ emission limit, and is vented to a baghouse. Therefore, CAM is being evaluated for this operation. The pre-control emissions are estimated using permitted throughput and emission factors in addition to the 99% control efficiency of the baghouse for PM₁₀ emissions.

$$\begin{aligned} &= (0.0027 \text{ lb-PM}_{10}/\text{ton of sugar received})(75 \text{ tons/day})(365 \text{ days/yr})/(1-0.99) \\ &= 7,391 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Pre-control PM₁₀ emissions from each unit are less than the Major Source threshold for PM₁₀. Therefore, these units did not trigger CAM for PM₁₀.

N-1933-12-2: GRAIN CLEANING, MILLING, STORAGE, AND ASSOCIATED CONVEYING SYSTEMS

This permit unit has been recently evaluated under project N1103454 (November 17, 2010), and contains a combined PM₁₀ emission limit for several emission units. Further, this permit unit is served by several dust collectors. Therefore, CAM is being evaluated for this permit unit.

Based on the pre-control emissions in Attachment E to this document, potential pre-control emissions from each roller mill are 209 tons/yr (170 tons/day x 20.3 lb-PM₁₀/ton of material x 365 days/3 roller mills), which exceeds 70 tons/yr threshold for PM₁₀. Therefore, each roller mill triggers CAM. The roller mills are served by General Resources 58CT8 (4F) dust collector. To satisfy CAM, Post is required to install a pressure differential gauge on this dust collector to monitor and record the pressure drop across the bags each day the grain milling process operates. Note the pre-control

emissions for the other units are less than the Major Source threshold for PM₁₀; therefore, those units did not trigger CAM evaluation.

N-1933-15-2: SUGAR STORAGE SILO #6 SERVED BY A SINTAMATIC MODEL SU-40HS5AD DUST COLLECTOR

This operation has a PM₁₀ emission limit, and is vented to a dust collector. Therefore, CAM is being evaluated for this operation. The pre-control emissions are estimated using permitted throughput and emission factors in addition to the 99% control efficiency of the baghouse for PM₁₀ emissions.

$$\begin{aligned} &= (0.01 \text{ lb-PM}_{10}/\text{ton of sugar received})(540 \text{ tons/day})(365 \text{ days/yr})/(1-0.99) \\ &= 197,100 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the potential pre-control emissions are more than 70 tons/year for PM₁₀, CAM triggers for this unit. To satisfy CAM, Post is required to install a pressure differential gauge on this dust collector to monitor and record the pressure drop across the bags each day the sugar receiving process operates.

N-1933-16-1: SUGAR AND FRUCTOSE BLENDING AND TRANSPORT ROOM SERVED BY A SINTAMATIC MODEL SU-24H DUST COLLECTOR (2ND FLOOR)

This permit does not have a PM₁₀ emission limit. Therefore, CAM evaluation is not required.

N-1933-19-6: 29.92 MMBTU/HR CLEAVER BROOKS MODEL CB-700-700-200 NATURAL GAS-FIRED BOILER WITH A CLEAVER BROOKS MODEL INTEGRAL ULTRA LOW NOX BURNER

This boiler has emissions limits for SO_x, PM₁₀, CO, and VOC but they do not have add-on controls for these criteria pollutants. Therefore, CAM evaluation is not required for these pollutants.

The unit may be subject to CAM for NO_x, as there is a NO_x limit, and they have an FGR system as an add-control. Based on emission factors from AP-42, Table 1.4-1, July 1998, the FGR provides 36% control of NO_x emissions. The pre-control emissions of this unit would be:

$$\begin{aligned} &= (29.92 \text{ MMBtu/hr})(0.008 \text{ lb-NO}_x/\text{MMBtu})(8,760 \text{ hr/yr})/(1-0.36) \\ &= 3,276 \text{ lb-NO}_x/\text{year} \end{aligned}$$

The pre-control NO_x emissions are less than the Major Source threshold for NO_x. Therefore, this unit is not subject to CAM.

N-1933-20-5: 29.92 MMBTU/HR NATURAL GAS-FIRED CLEAVER BROOKS, MODEL CB-700-700-200, BOILER (NO.2) WITH A CLEAVER BROOKS MODEL NTI-700 ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM

This boiler has emissions limits for SO_x, PM₁₀, CO, and VOC but they do not have add-on controls for these criteria pollutants. Therefore, CAM evaluation is not required for these pollutants.

The unit may be subject to CAM for NO_x, as there is a NO_x limit, and they have an FGR system as an add-control. Based on emission factors from AP-42, Table 1.4-1, July 1998, the FGR provides 36% control of NO_x emissions. The pre-control emissions of this unit would be:

$$\begin{aligned} &= (29.92 \text{ MMBtu/hr})(0.008 \text{ lb-NO}_x\text{/MMBtu})(8,760 \text{ hr/yr})/(1- 0.36) \\ &= 3,276 \text{ lb-NO}_x\text{/year} \end{aligned}$$

The pre-control NO_x emissions are less than the Major Source threshold for NO_x. Therefore, this unit is not subject to CAM.

N-1933-21-3: TACK SYSTEM CONSISTING OF A DIVERTER FROM THE EXISTING GRAPE NUTS FINISHED PRODUCT LINE (N-1933-4); SURGE BIN; WEIGH BELT SCALE; GRADER ASSEMBLY; TACK GRINDER ASSEMBLY; FINES GRINDER ASSEMBLY; PNEUMATIC CONVEYING SYSTEMS TO SILO #9; AND COATING REELS

This permit has a PM₁₀ emission limit. Furthermore, the emission units in this permit (surge bin, weigh belt scale, grader assembly, tack grinder assembly, and fines grinder assembly) are vented to a dust collector. Therefore, CAM evaluation is required for these units. The pre-control emissions are estimated using permitted throughput and emission factors in addition to the 99% control efficiency of the dust collector for PM₁₀ emissions.

$$\begin{aligned} &= (0.012 \text{ lb-PM}_{10}\text{/ton of product processed})(8 \text{ tons/day})(365 \text{ days/yr})/(1-0.99) \\ &= 3,504 \text{ lb-PM}_{10}\text{/yr} \end{aligned}$$

The pre-control PM₁₀ emissions from permit unit are less than Major Source threshold for PM₁₀. Therefore, it is conservatively assumed that the pre-control emissions from each unit would be less than Major Source threshold for PM₁₀, and CAM is not required.

N-1933-26-1: BRAN SILO #3 AND BRAN GRINDING OPERATION SERVED BY A MAC MODEL 39AVRC32 DUST COLLECTOR; BRAN RECEIVER AND 2,200 LB GROUND BRAN STORAGE TANK SERVED BY A MAC MODEL 19AVRC7 DUST COLLECTOR; 1,000 LB STORAGE TANK SERVED BY A

BIN VENT FILTER; SIFTER; BRAN FEEDER SYSTEM; AND ASSOCIATED AIRWAYS

This permit has a PM₁₀ emission limit. Furthermore, the emission units in this permit are vented to various dust collectors. Therefore, CAM is being evaluated for these units.

The pre-control emissions are estimated using permitted throughput and emission factors in addition to the 99% control efficiency of the dust collector for PM₁₀ emissions.

$$\begin{aligned} &= (0.05 \text{ lb-PM}_{10}/\text{ton of product processed})(9.6 \text{ tons/day})(365 \text{ days/yr})/(1-0.99) \\ &= 17,520 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

The pre-control PM₁₀ emissions from permit unit are less than Major Source threshold for PM₁₀. Therefore, it is conservatively assumed that the pre-control emissions from each unit would be less than Major Source threshold for PM₁₀, and CAM is not required.

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 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

By using the model general permit template(s) listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template(s). The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

The model general permit template contains requirements related to the permit shields. Therefore, no further discussion is necessary.

XI. PERMIT CONDITIONS

See Attachment A – Draft Title V Operating Permit.

XII. ATTACHMENTS

- A. Draft Title V Operating Permit
- B. Detailed Facility List
- C. Exempt Equipment
- D. Permits to Operate
- E. Pre-Control Emission Calculations

Attachment A
Draft Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-1933-0-1

EXPIRATION DATE: 07/31/2014

FACILITY-WIDE REQUIREMENTS

1. {4362} 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; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} 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; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} 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. {4365} 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. {4366} 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. {4367} 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. {4368} 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. {4369} 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. {4370} 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: POST FOODS, LLC
Location: 901 E WHITMORE, MODESTO, CA 95358
N-1933-0-1 Oct 2 2012 8:27AM -- KAH/LONJ

10. {4371} 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. {4372} 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. {4373} 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. {4374} 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. {4375} 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. {4376} 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. {4377} 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. {4378} 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. {4379} 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. {4380} 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. {4381} 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. {4382} 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

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

22. {4383} 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, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} 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. {4385} 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. {4386} 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. {4387} 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. {4388} 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. {4389} 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. {4390} 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. {4391} 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. {4392} 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. {4393} 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. {4394} 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

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

34. {4395} 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. {4396} 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
36. {4397} 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. {4398} 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. {4399} 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. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On {Month, Day, Year}, 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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-1-2

EXPIRATION DATE: 07/31/2014

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

BULK RECEIVING AND STORAGE OPERATIONS CONSISTING OF TWO RECEIVING BINS (A AND B) SERVED BY A PNEUMATIC RAILCAR UNLOADING SYSTEM, AND A TRUCK WHEAT RECEIVING BIN SERVING 15 STORAGE SILOS VIA A PNEUMATIC CONVEYING SYSTEM

PERMIT UNIT REQUIREMENTS

1. The receiving and storage systems consist of two receiving bins (A and B) served by a pneumatic railcar unloading system and a truck wheat receiving bin. Both receiving bins A and B, via a pneumatic conveying system, serve 15 storage silos. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each of the silos (silos #2 through #5, #7, #8, #9, and #11 through #18) shall be vented to its own dust collector. Two silos shall be vented to General Resource Group 14054.8 dust collectors. Three silos shall be vented to DCE SU24HS4 dust collectors. Ten silos shall be vented to DCE C24HF6 dust collectors. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions from each dust collector shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. 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
5. Replacement bags or cartridges numbering at least 10% of the total number of bags or cartridges in the largest dust collector using each type of bag or cartridge shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Visible emissions from each dust collector shall not 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
9. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The quantity of material received shall not exceed 120 tons per silo per day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The PM10 emissions shall not exceed 0.0008 pounds per ton of material received. [District Rule 2201] Federally Enforceable Through Title V Permit

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

12. A daily log shall be maintained on the premises indicating the amount and type of material received in each silo. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
17. 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

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-2-3

EXPIRATION DATE: 07/31/2014

SECTION: **TOWNSHIP:** MO **RANGE:**

EQUIPMENT DESCRIPTION:

RAW GRAIN CLEANING AND PROCESSING OPERATION CONSISTING OF WHITE WHEAT PROCESSING, BARLEY PROCESSING, AND 15 STORAGE SILOS

PERMIT UNIT REQUIREMENTS

1. The white wheat processing operation consists of: (sixth floor) three receiving bins; (fifth floor) wheat separator vibrator, three separators, wheat bin, cracking system; (fourth floor) two surge bins, a destoner; (third floor) and a concentrator. [District Rule 2080] Federally Enforceable Through Title V Permit
2. The white wheat processing equipment except the destoner are vented to a General Resource Group 14054.8 dust collector and DCE, Inc. Model UNC 160H R dust collector (third floor). The destoner is vented to a General Resource Group 14024.6 dust collector (third floor). [District Rule 2201] Federally Enforceable Through Title V Permit
3. The barley processing operation consists of: (fifth floor) a receiving bin, a separator, 14 screen filter; (fourth floor) a surge bin, two breaks, impact finisher, auger; (third floor) a hammer mill, a lifter; (second floor) and a flour storage bin. [District Rule 2080] Federally Enforceable Through Title V Permit
4. The above barley processing equipment is vented to a General Resource Group 14030.6 dust collector (fifth floor). [District Rule 2080] Federally Enforceable Through Title V Permit
5. The barley processing operation also consists of: (fifth floor) a 7 screen filter vented to a General Resource Group 14009.6 dust collector (fifth floor). [District Rule 2080] Federally Enforceable Through Title V Permit
6. Particulate matter emissions from each dust collector shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. 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
8. 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
9. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. Visible emissions from the dust collectors 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
12. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

13. The quantity of grain processed through the white wheat processing operation shall not exceed 150 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. PM10 emissions from the General Resource 14054.8 and the DCE, Inc. Model UNC 160H R dust collectors serving the white wheat processing equipment shall not exceed 0.002 pounds per ton of grain processed. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Daily records shall be maintained and shall include: (a) The date; (b) The quantity of grain processed through the white wheat processing operation in tons. [District Rule 1070] Federally Enforceable Through Title V Permit
16. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
20. 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

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-3-8

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

BRAN FLAKES CEREAL PROCESSING OPERATION CONSISTING OF STORAGE BINS, BLENDERS, SIFTERS, MINOR INGREDIENT PNEUMATIC CONVEYING SYSTEM SERVED BY A PNEU-CON PNEUMATIC CONVEYING MODEL CP2000 DUST COLLECTOR, TWO STEAM HEATED COOKERS, ONE 8.0 MMBTU/HR NATURAL GAS FIRED ROTO-LOUVRE DRYER, FOUR CEREAL FLAKERS, TWO STEAM HEATED DRYERS, GRINDERS, SHAKERS, AND PACKAGING EQUIPMENT VENTED TO VARIOUS DUST COLLECTORS; FIVE COATING REELS VENTED TO ROTOCONE CENTRIFUGAL COLLECTORS; ONE 8.0 MMBTU/HR AEROGlide MODEL C1 120 66 RGC FINISHED FLAKES CEREAL DRYER AND COOLER VENTED TO A HORIZON SYSTEMS, INC. MODEL 4HE32 HIGH EFFICIENCY MULTICYCLONES IN PARALLEL AND ASSOCIATED CONVEYING EQUIPMENT.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. 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
3. 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
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] Federally Enforceable Through Title V Permit
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. 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
7. The quantity of cereal flakes ingredients processed through the cereal flakes processing operation shall not exceed 190 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the cereal flakes processing operations served by baghouses shall not exceed 0.012 pounds per ton of cereal flakes ingredients processed. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The emission rates from the Roto-Louvre dryer, shall not exceed any of the following limits: 4.3 ppmv NO_x, dry, corrected to 19% O₂, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM10/MMBtu, 20.0 ppmv CO, dry, corrected to 19% O₂, 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
10. The combined quantity of bran flakes processed through the five bran coating reels shall not exceed 180 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emission rate from the rotocone wet centrifugal collectors serving the coating reels shall not exceed 0.01 pounds per ton of cereal flakes processed. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The emission rates from the Aeroglide dryer shall not exceed any of the following limits: 2.1 ppmv NO_x, dry, corrected to 19% O₂, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM10/MMBtu, 20.0 ppmv CO, dry, corrected to 19% O₂, 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The quantity of cereal flakes processed through the Aeroglide finished cereal flakes dryer/cooler shall not exceed 180 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The PM10 emission rate (excluding PM10 emissions due to the combustion of natural gas) from the cyclones serving the Aeroglide finished cereal flakes dryer/cooler shall not exceed 0.002 pounds per ton of bran flakes processed. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The quantity of minor ingredient dispensed using pneumatic conveying system shall not exceed 11 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. PM10 emissions from the pne-con dust collector serving the pneumatic conveying system shall not exceed 0.00034 pounds per ton of material conveyed. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The Aeroglide and Rot-Louvre dryers shall each be only fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
18. Visible emissions from the dust collectors, baghouses, cyclones, or rotoclones (wet centrifugal collectors) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Visible emissions shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
21. Source testing to measure NOx and CO emissions from the Aeroglide dryer and the Rot-Louvre dryer shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
24. 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
25. 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
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] Federally Enforceable Through Title V Permit
27. 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
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] Federally Enforceable Through Title V Permit
29. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 for the Aeroglide and Rot-Louvre dryers 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 dryer is not in operation, i.e. dryer need not be started solely to perform monitoring. Monitoring shall be performed within five days of restarting the dryer unless monitoring has been performed within the last month. [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.

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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
32. The permittee shall maintain the following records for Aeroglide and Rot-Louvre dryers: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), (3) make and model of exhaust gas analyzer for each dryer, (4) exhaust gas analyzer calibration records, and (5) description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
33. The permittee shall maintain a daily record of the following: (a) Total quantity of cereal flakes ingredients processed in tons/day; (b) Total quantity of cereal flakes processed through the five coating reels served by rotoclones in tons/day; (c) Total quantity of cereal flakes processed through the Aeroglide finished cereal flakes dryer in tons/day; (d) Total quantity of minor ingredient conveyed through the pneumatic conveying system in tons/day. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
37. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
38. The permittee shall maintain daily records of hours of operations, type and quantity of fuel used for each Aeroglide and Roto-Louvre dryers. [District Rule 4309] Federally Enforceable Through Title V Permit
39. 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 and 4309] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

EXPIRATION DATE 07/31/2014

PERMIT UNIT: N-1933-4-3

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

GRAPE NUT PROCESS LINES 5, 9, 10, 11, AND 12 WITH A DIVERTER FROM THE GRAPE NUTS SURGE BIN TO DIVERT THE GRAPE NUTS TO THE PACKAGING LINE OR THE TACK SYSTEM (N-1933-21)

PERMIT UNIT REQUIREMENTS

1. System #5 consists of two fines bins each vented to a Flex Kleen dust collector (fourth floor). These bins are served by a General Resource Group baghouse (fifth floor). [District Rule 2201] Federally Enforceable Through Title V Permit
2. System #9 consists of a flour blending and conveying operation (second floor) vented to a General Resource Group baghouse (fifth floor). Conveyed material is collected in a Flex Kleen collector and weigh bin (sixth floor), and a dough mixing operation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. System #10 consists of a dough baking operation (fourth floor). [District Rule 2201] Federally Enforceable Through Title V Permit
4. System #11 consists of dryer A (including shredding third floor) and dryer B (second floor) all vented to a General Resource Group baghouse (sixth floor). [District Rule 2201] Federally Enforceable Through Title V Permit
5. System #12 consists of a bucket elevator serving dryer B and serving the unground surge bin (fifth floor) vented to a General Resource Group baghouse (fifth floor). [District Rule 2201] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. Visible emissions from each of the dust collectors shall not 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
11. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
16. 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

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

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San Joaquin Valley Air Pollution Control District

EXPIRATION DATE 07/31/2014
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PERMIT UNIT: N-1933-5-2

SECTION: **TOWNSHIP:** MO **RANGE:**

EQUIPMENT DESCRIPTION:

GRAPE NUT PROCESS LINES 13 AND 14 SERVED BY TWO GENERAL RESOURCES BAGHOUSES (THIRD AND FIFTH FLOORS)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. 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
3. 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
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. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emission in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] 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] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-6-7

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

GUN PUFFED PRODUCT PROCESSING OPERATION CONSISTING OF STORAGE BINS, BLENDERS, EXTRUDERS, ONE 1.2 MMBTU/HR NATURAL GAS-FIRED PELLET DRYER, ONE 0.5 MMBTU/HR NATURAL GAS-FIRED PELLET HEATER, ONE STEAM HEATED PUFFING GUN, ONE GUN PUFFED EXPANSION CHAMBER WITH A 1.0 MMBTU/HR NATURAL GAS-FIRED BURNER, PUFF BINS, FINISHED PRODUCT BINS, AND PACKAGING EQUIPMENT VENTED TO VARIOUS DUST COLLECTORS; TWO COATING REELS VENTED TO ROTOCLONE CENTRIFUGAL COLLECTORS; TWO 3 MMBTU/HR NATURAL GAS-FIRED AEROGlide MODEL C1 45 63 RGC(E) PRE-SWEET PUFFED CEREAL DRYERS AND COOLER EACH VENTED TO A HORIZON SYSTEMS, INC. MODEL #2HE30 HIGH EFFICIENCY MULTICYCLONES IN PARALLEL

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. 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
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. Replacement bags or cartridges numbering at least 10% of the total number of bags or cartridges in the largest dust collector using each type of bag or cartridge shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of puff cereal processed and packaged shall not exceed 120 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of sugar processed through the 6th floor sugar receiving bin shall not exceed 14.6 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The amount of material received in the barley receiver bin shall not exceed 20 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The PM10 emissions from the puff cereal processing operations (excluding PM10 emissions from sugar and barley flour receiving and excluding PM10 emissions due to the combustion of natural gas) shall not exceed 0.068 pounds per ton of puff cereal processed. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The PM10 emissions from the baghouse serving the 6th floor sugar receiving bin shall not exceed 0.003 pounds per ton of sugar processed. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The PM10 emissions shall not exceed 0.016 pounds per ton of barley flour received through the barley receiver bin. [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.

13. The NOx emission rate due to the combustion of natural gas from each Aeroglide finished puff cereal dryer shall not exceed 20 ppmv, dry, corrected to 3% O2 (equivalent to 0.20 lb/hr). [District Rule 2201] Federally Enforceable Through Title V Permit
14. The CO emission rate due to the combustion of natural gas from each Aeroglide finished cereal flakes dryer shall not exceed 80 ppmv, dry, corrected to 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The PM10 emission rate due to the combustion of natural gas from each Aeroglide finished puff cereal dryer shall not exceed 0.0076 lb/MMBTU. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The SOx emission rate due to the combustion of natural gas from each Aeroglide finished puff cereal dryer shall not exceed 0.00285 lb/MMBTU. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The VOC emission rate due to the combustion of natural gas from each Aeroglide finished puff cereal dryer shall not exceed 0.0055 lb/MMBTU. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Visible emissions from the dust collectors, baghouses, cyclones, or Rotoclone wet centrifugal collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. The permittee shall maintain a daily record of the following: (a) Total quantity of puff cereal processed in tons/day; (b) Total quantity of sugar processed through the 6th floor sugar receiving bin in tons/day; (c) Total quantity of barley flour received in the barley receiver bin in tons/day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
25. 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

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

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San Joaquin Valley Air Pollution Control District

EXPIRATION DATE: 07/31/2014

PERMIT UNIT: N-1933-7-4

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

RECLAIM OPERATION CONSISTING OF ONE FEED HOPPER, ONE AUGER DIVERTER AND TWO GRINDERS VENTED TO A GENERAL RESOURCES MODEL 14030.6 BAGHOUSE; AND A PNEUMATIC CONVEYING SYSTEM SERVING SILO #1 VENTED TO A DCE MODEL C72HK BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Each 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. 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
3. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [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. Particulate matter emissions from each dust collector shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. Visible emissions from each baghouse serving the reclaim process 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. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. No more than 75 tons of material shall be processed and transferred into the silo in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The PM10 emission rate from the silo shall not exceed 0.0027 pounds per ton of material transferred into the silo. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The PM10 emission rate from the General Resources model 14030.6 baghouse serving the material input and grinding operations shall not exceed 0.006 pounds per ton of material processed. [District Rule 2201] Federally Enforceable Through Title V Permit
11. A daily record of the amount of material transferred into the silo shall be maintained at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
16. 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

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

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San Joaquin Valley Air Pollution Control District

EXPIRATION DATE: 07/31/2014

PERMIT UNIT: N-1933-12-2

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

GRAIN CLEANING, MILLING, STORAGE, AND ASSOCIATED CONVEYING SYSTEMS

PERMIT UNIT REQUIREMENTS

1. Grain Cleaning and Conveying System: This system includes 3 Buhler cyclones, a Buhler MANV-280 separator and Buhler MTMA-1500A aspirator channel, a Buhler MTRI 90/150 RX indent separator, a Buhler combinator MTCD 64/150, a Buhler MTC-100 gravity table, a Buhler MJZD detacher, a Buhler MHXF-30/150 scourer, a Buhler aspirator MVSO-100, a dampening auger and a tampering bin. Except the dampening auger and a tampering bin, all units shall be vented to a General Resource 14048.6 (3H) dust collector. The product (i.e. overs, seeds, or other similar products) collected by these units shall be pneumatically conveyed into silo #1 served by a Sintamatic DCE C72-HK11 dust collector. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Grain Milling and Conveying System: This system includes 3 Buhler MDDK-10/40 roller mills, 7 Buhler cyclones (3 Buhler cyclone for roller mill 1, 2 Buhler cyclone for roller mill 2, and 2 Buhler cyclone for roller mill 3), 1 Great Western 4x22 sifter, 3 Buhler MKLA-45/100 dusters, and 2 Buhler MAEF scales. All these units shall be vented to a General Resource 58CT8 (4F) dust collector. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Flour Conveying and Storage System: This system consists of pneumatic conveying of flour into silo #12 served by a Sintamatic DCE C24-HF6AD dust collector, pneumatic conveying of flour into silo #18 served by a Sintamatic DCE SU24-HS4AD dust collector, and pneumatic conveying of flour into silo #10 served by a Horizon Systems Inc 58RF14 dust collector. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Bran Conveying and Storage System: This system consists of pneumatic conveying of bran to silo #1 served by a Sintamatic DCE C72-HK11 dust collector, pneumatic conveying of bran to silo #3 served by a Sintamatic DCE C24-HF6AD dust collector, and mechanical or gravity conveying to bran grinding operation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The General Resource 58CT8 (4F) dust collector in the Grain Milling and Conveying System shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The differential pressure gauge reading range for the General Resource 58CT8 (4F) dust collector in the Grain Milling and Conveying System shall be established per manufacturer's recommendation. The established range shall be listed in the Permit to Operate. [40 CFR Part 64] Federally Enforceable Through Title V Permit
7. Replacement bags or cartridges numbering at least 10% of the total number of bags or cartridges in the largest dust collector using each type of bag or cartridge shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [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.

10. Visible emissions at the exhaust of each dust collector system 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
11. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Particulate matter emissions, at exhaust of each dust collector, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
13. The combined amount of flour and bran production shall not exceed 170 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The total PM10 emissions from the systems under this permit shall not exceed 0.105 pounds per ton of the total flour and bran produced. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall keep records of date and the amount of flour and bran produced. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Differential operating pressure for the General Resource 58CT8 (4F) dust collector in the Grain Milling and Conveying System shall be monitored and recorded on each day the grain milling system operates. [40 CFR Part 64] Federally Enforceable Through Title V Permit
17. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-15-2

EXPIRATION DATE: 07/31/2014

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

SUGAR STORAGE SILO #6 SERVED BY A SINTAMATIC MODEL SU-40HS5AD DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions from the dust collector shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filter elements. The gauge shall be maintained in working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. The differential pressure gauge reading range for the dust collector shall be established per manufacturer's recommendation. The established range shall be listed in the Permit to Operate. [40 CFR Part 64] Federally Enforceable Through Title V Permit
4. Replacement filter elements numbering at least 10% of the total number of filter elements in the largest dust collector using each type of filter element shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
5. 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
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. There shall be no visible emissions from the dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The quantity of sugar loaded into the storage silo shall not exceed 540 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 0.01 pounds per ton of sugar loaded into the storage silo. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Differential operating pressure for the dust collector shall be monitored and recorded on each day the sugar receiving process operates. [40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
16. 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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-16-1

EXPIRATION DATE: 07/31/2014

SECTION: **TOWNSHIP:** MO **RANGE:**

EQUIPMENT DESCRIPTION:

SUGAR AND FRUCTOSE BLENDING AND TRANSPORT ROOM SERVED BY A SINTAMATIC MODEL SU-24H DUST COLLECTOR (2ND FLOOR)

PERMIT UNIT REQUIREMENTS

1. The Sintamatic dust collection systems shall be equipped with a pressure gauge to indicate the pressure drop between the filters. The gauge shall be maintained in good working condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions from the dust collector shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. A spare set of filter elements shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The 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 the dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Records of all maintenance of dust collector system, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
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] 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-1933-19-6

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

29.92 MMBTU/HR CLEAVER BROOKS MODEL CB-700-700-200 NATURAL GAS-FIRED BOILER WITH A CLEAVER BROOKS MODEL INTEGRAL ULTRA LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be utilized and maintained. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
5. NOx emissions shall not exceed 7 ppmvd @ 3% O₂ (0.008 lb/MMBtu) referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM₁₀ emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CO emissions shall not exceed 400 ppmvd @ 3% O₂ (0.296 lb/MMBtu). [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
11. This unit shall be tested for compliance with the NOx and CO emissions limits at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. During 36-month interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown [District Rules 4305, 4306, 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.

13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. NOx 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
17. 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
18. Stack gas oxygen (O2) 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
19. Fuel sulfur content shall be determined using EPA Method 11 or EPA Method 15 or District, CARB and EPA approved alternative methods. [District Rule 4320] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The flue gas recirculation rate shall be determined at least on a weekly basis by measuring the stack temperature (Ts), windbox temperature (Tw), and ambient temperature (Ta) and using the following equation: $FGR \text{ rate} = \frac{Tw - Ta}{Ts - Ta} \times 100\%$. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306, 4320] Federally Enforceable Through Title V Permit
22. The minimum flue gas recirculation rate shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be no lower than the minimum flue gas recirculation rate with which compliance with applicable NOx and CO emission limits has been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. If the flue gas recirculation rate is less than the normal range/level, the permittee shall return the flue gas recirculation rate to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation rate. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. 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
24. The permittee shall maintain records of the date and time of temperature measurements, the measured temperatures, the calculated flue gas recirculation rate, and the firing rate at the time of the temperature measurements. The records shall also include a description of any corrective action taken to maintain the flue gas recirculation rate within the acceptable range. [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.

25. The permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
26. 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] Federally Enforceable Through Title V Permit
27. Records of tune-up of the unit shall be maintained. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
28. 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, 4305, 4306 and 4320 and 40 CFR 60c(i)] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-20-5

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

29.92 MMBTU/HR NATURAL GAS-FIRED CLEAVER BROOKS, MODEL CB-700-700-200, BOILER (NO.2) WITH A CLEAVER BROOKS MODEL NTI-700 ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be utilized and maintained. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
5. NOx emissions shall not exceed 7 ppmvd @ 3% O2 (0.008 lb/MMBtu) referenced as NO2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CO emissions shall not exceed 100 ppmvd @ 3% O2 (0.074 lb/MMBtu). [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
11. This unit shall be tested for compliance with the NOx and CO emissions limits at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. During 36-month interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown [District Rules 4305, 4306, 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.

13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. NOx 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
17. 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
18. Stack gas oxygen (O2) 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
19. Fuel sulfur content shall be determined using EPA Method 11 or EPA Method 15 or District, CARB and EPA approved alternative methods. [District Rule 4320] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The flue gas recirculation rate shall be determined at least on a weekly basis by measuring the stack temperature (Ts), windbox temperature (Tw), and ambient temperature (Ta) and using the following equation: $FGR \text{ rate} = \{(Tw - Ta)/(Ts - Ta)\} \times 100\%$. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306, 4320] Federally Enforceable Through Title V Permit
22. The minimum flue gas recirculation rate shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be no lower than the minimum flue gas recirculation rate with which compliance with applicable NOx and CO emission limits has been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. If the flue gas recirculation rate is less than the normal range/level, the permittee shall return the flue gas recirculation rate to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation rate. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. 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
24. The permittee shall maintain records of the date and time of temperature measurements, the measured temperatures, the calculated flue gas recirculation rate, and the firing rate at the time of the temperature measurements. The records shall also include a description of any corrective action taken to maintain the flue gas recirculation rate within the acceptable range. [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.

25. The permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
26. 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] Federally Enforceable Through Title V Permit
27. Records of tune-up of the unit shall be maintained. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. 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, 4305, 4306 and 4320 and 40 CFR 60c(i)] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-21-3

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

TACK SYSTEM CONSISTING OF A DIVERTER FROM THE EXISTING GRAPE NUTS FINISHED PRODUCT LINE (N-1933-4); SURGE BIN; WEIGH BELT SCALE; GRADER ASSEMBLY; TACK GRINDER ASSEMBLY; FINES GRINDER ASSEMBLY; PNEUMATIC CONVEYING SYSTEMS TO SILO #9; AND COATING REELS

PERMIT UNIT REQUIREMENTS

1. The surge bin, weigh belt scale, grader assembly, tack grinder assembly, and fines grinder assembly shall be vented to a MAC 19FRBC7 cartridge dust collector during operation. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The fines from this operation are pneumatically conveyed to Silo #9. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The finished "tack" material is pneumatically conveyed to the two coating reels of N-1933-6. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions from the dust collector shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material removed from dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The cleaning frequency and duration of the dust collector shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Replacement cartridges numbering at least 10% of the total number of cartridges in this dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Visible emissions from the dust collector shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. The amount of material processed shall not exceed 8 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The PM10 emissions concentration shall not exceed 0.012 pounds per ton of material processed. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall maintain a daily record of the quantity of material 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.

14. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
18. 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

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

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San Joaquin Valley Air Pollution Control District

EXPIRATION DATE: 07/31/2014

PERMIT UNIT: N-1933-26-1

EQUIPMENT DESCRIPTION:

BRAN SILO #3 AND BRAN GRINDING OPERATION SERVED BY A MAC MODEL 39AVRC32 DUST COLLECTOR; BRAN RECEIVER AND 2,200 LB GROUND BRAN STORAGE TANK SERVED BY A MAC MODEL 19AVRC7 DUST COLLECTOR; 1,000 LB STORAGE TANK SERVED BY A BIN VENT FILTER; SIFTER; BRAN FEEDER SYSTEM; AND ASSOCIATED AIRWAYS

PERMIT UNIT REQUIREMENTS

1. Air displaced from receiver cyclone #1 shall be vented to a MCA 19AVRC7 dust collector prior to being discharged to atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Air displaced from receiver cyclone #2 shall be vented to a MCA 19AVR32 dust collector prior to being discharged to atmosphere. Dust collector MCA19AVR32 shall also serve bran grinder. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Visible emissions from dust collector(s) serving this operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions from each dust collector shall be checked quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from each dust collector shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. Bran receiving and processing operation throughput shall not exceed 9.6 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Bran receiving and processing operation PM10 emissions shall not exceed 0.05 pounds per ton of material processed. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall maintain records of daily and annual amounts of bran processed. [District Rule 1070] Federally Enforceable Through Title V Permit
9. The dust collection systems shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Records of all maintenance of dust collector systems, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

12. Particulate matter emissions from any source operation shall not exceed the hourly rate calculated using equation $E = 3.59 \times P^{0.62}$, if P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$ if P is greater than 30 tons per hour, where E = Emissions in pounds per hour, P = Process weight rate in tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit

DRAFT

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

Attachment B
Detailed Facility List

Detailed Facility Report
For Facility=1933
Sorted by Facility Name and Permit Number

POST FOODS, LLC 901 E WHITMORE MODESTO, CA 95358	FAC # STATUS: TELEPHONE:	N 1933 A	TYPE: TOXIC ID:	TitleV	EXPIRE ON: AREA: INSP. DATE:	07/31/2014 6 / 09/12
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1933-1-1	730 HP Electric motors	3020-01 F	1	607.00	607.00	A	BULK RECEIVING AND STORAGE OPERATIONS CONSISTING OF TWO RECEIVING BINS (A AND B) SERVED BY A PNEUMATIC RAILCAR UNLOADING SYSTEM, AND A TRUCK WHEAT RECEIVING BIN SERVING 15 STORAGE SILOS VIA A PNEUMATIC CONVEYING SYSTEM
N-1933-2-1	730 HP Electric motors	3020-01 F	1	607.00	607.00	A	RAW GRAIN CLEANING AND PROCESSING OPERATION CONSISTING OF WHITE WHEAT PROCESSING, BARLEY PROCESSING, AND 15 STORAGE SILOS
N-1933-3-6	16 MMBtus/hr (total heat input)	3020-02 H	1	1,030.00	1,030.00	A	BRAN FLAKES CEREAL PROCESSING OPERATION CONSISTING OF STORAGE BINS, BLENDERS, SIFTERS, ONE INLUN PNEUMATIC CONVEYING SYSTEM SERVED BY A PNEU-CON PNEUMATIC CONVEYING MODEL CP2000 DUST COLLECTOR, TWO STEAM HEATED COOKERS, ONE 8.0 MMBTU/HR NATURAL GAS FIRED ROTO-LOUVRE DRYER, FOUR CEREAL FLAKERS, TWO STEAM HEATED DRYERS, GRINDERS, SHAKERS, AND PACKAGING EQUIPMENT VENTED TO VARIOUS DUST COLLECTORS; FIVE COATING REELS VENTED TO ROTOCONE CENTRIFUGAL COLLECTORS; ONE 8.0 MMBTU/HR AEROGlide MODEL C1 120 66 RGC FINISHED FLAKES CEREAL DRYER AND COOLER VENTED TO A HORIZON SYSTEMS, INC. MODEL 4HE32 HIGH EFFICIENCY MULTICYCLONES IN PARALLEL AND ASSOCIATED CONVEYING EQUIPMENT.
N-1933-4-1	15,000 KBTU/HR	3020-02 H	1	1,030.00	1,030.00	A	GRAPE NUT PROCESS LINES 5, 9, 10, 11, AND 12 WITH A DIVERTER FROM THE GRAPE NUTS SURGE BIN TO DIVERT THE GRAPE NUTS TO THE PACKAGING LINE OR THE TACK SYSTEM (N-1933-21)
N-1933-5-0	730 HP Electric motors	3020-01 F	1	607.00	607.00	A	GRAPE NUT PROCESS LINES 13 AND 14 SERVED BY TWO GENERAL RESOURCES BAGHOUSES (THIRD AND FIFTH FLOORS)
N-1933-6-5	8,700 KBTu/hr (Total Heat Input)	3020-02 G	1	815.00	815.00	A	GUN PUFFED PRODUCT PROCESSING OPERATION CONSISTING OF STORAGE BINS, BLENDERS, EXTRUDERS, ONE 1.2 MMBTU/HR NATURAL GAS-FIRED PELLET DRYER, ONE 0.5 MMBTU/HR NATURAL GAS-FIRED PELLET HEATER, ONE STEAM HEATED PUFFING GUN, ONE GUN PUFFED EXPANSION CHAMBER WITH A 1.0 MMBTU/HR NATURAL GAS-FIRED BURNER, PUFF BINS, FINISHED PRODUCT BINS, AND PACKAGING EQUIPMENT VENTED TO VARIOUS DUST COLLECTORS; TWO COATING REELS VENTED TO ROTOCONE CENTRIFUGAL COLLECTORS; TWO 3 MMBTU/HR NATURAL GAS-FIRED AEROGlide MODEL C1 45 63 RGC(E) PRE-SWEET PUFFED CEREAL DRYERS AND COOLER EACH VENTED TO A HORIZON SYSTEMS, INC. MODEL #2HE30 HIGH EFFICIENCY MULTICYCLONES IN PARALLEL
N-1933-7-3	735 HP Electric motors	3020-01 F	1	607.00	607.00	A	RECLAIM OPERATION CONSISTING OF ONE FEED HOPPER, ONE AUGER DIVERTER AND TWO GRINDERS VENTED TO A GENERAL RESOURCES MODEL 14030.6 BAGHOUSE; AND A PNEUMATIC CONVEYING SYSTEM SERVING SILO #1 VENTED TO A DCE MODEL C72HK BAGHOUSE

Detailed Facility Report
For Facility=1933
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1933-8-2	6,000 KBTU/HR	3020-02 G	1	815.00	815.00	D	6.277 MMBTU/HR CLEAVER BROOKS MODEL CB200-150BHP (S/N L61839) BOILER *** PERMIT DELETED PER SOURCE REQUEST. JS 9/14/06. ***
N-1933-9-1	Total Electric Motors: 5 hp	3020-01 A	1	87.00	87.00	D	SUGAR AND FRUCTOSE PNEUMATIC CONVEYING AND STORAGE OPERATION FOR THE KOOL-AID PRODUCTS LINES CONSISTING OF ONE POUCH LINE STORAGE TANK AND ONE CAN LINE #1 STORAGE TANK EACH SERVED BY A GENERAL RESOURCES BAGHOUSE AND ONE CAN LINE #2 STORAGE TANK SERVED BY A FLEX-KLEEN MODEL 84CTB24 (II) BAGHOUSE.
N-1933-10-0	63 HP Electric motors	3020-01 C	1	197.00	197.00	D	KOOL AID POUCH LINE CONSISTING OF A BLENDER (4TH FLOOR) VENTED TO A GENERAL RESOURCE BAGHOUSE (4TH FLOOR), A SURGE TANK AND SIFTER (3RD FLOOR) AND PACKAGING LINES (1ST FLOOR) ALL VENTED TO A GENERAL RESOURCE MODEL 14048.6 BAGHOUSE (4TH FLOOR)
N-1933-11-0	105.5 HP Electric motors	3020-01 D	1	314.00	314.00	D	KOOL AID CAN LINE CONSISTING OF A BLENDER (4TH FLOOR) VENTED TO A GENERAL RESOURCE BAGHOUSE (4TH FLOOR), A SURGE TANK AND SIFTER (3RD FLOOR), SURGE TANK, AND PACKAGING LINES (1ST AND 2ND FLOORS) ALL VENTED TO A GENERAL RESOURCE BAGHOUSE (4TH FLOOR)
N-1933-12-0	417 HP Electric motors	3020-01 F	1	607.00	607.00	A	RED WHEAT/BRAN CLEANING, PROCESSING AND PNEUMATIC CONVEYING SYSTEM; AND BRAN FINES PNEUMATIC CONVEYING SYSTEM VENTED TO A GENERAL RESOURCE 58CT8 BAGHOUSE AND A GENERAL RESOURCE 14048.6 BAGHOUSE
N-1933-13-1	Total Electric Motors: 85 hp	3020-01 C	1	197.00	197.00	A	RAILCAR PNEUMATIC RECEIVING AND STORAGE OPERATION SERVING SILO #10 CONSISTING OF PNEUMATIC PUMPS VENTED THROUGH AN AZO INCORPORATED MODEL S750 RECEIVER/DUST COLLECTOR AND DCE INC. SINTAMATIC MODEL SU-40HS5AD SILO VENT DUST COLLECTOR.
N-1933-14-1	42,295 GALLONS	3020-05 C	1	135.00	135.00	D	FRUCTOSE STORAGE SILO #10 SERVED BY A SINTAMATIC MODEL SU-40HS5AD DUST COLLECTOR. ***DELETED BY KC ON 11/22/04 DUE TO THE IMPLEMENTATION OF ATC PERMIT N-1933-13-1.***
N-1933-15-1	42,295 GALLONS	3020-05 C	1	135.00	135.00	A	SUGAR STORAGE SILO #6 SERVED BY A SINTAMATIC MODEL SU-40HS5AD DUST COLLECTOR
N-1933-16-0	10 HP Electric motors	3020-01 A	1	87.00	87.00	A	SUGAR AND FRUCTOSE BLENDING AND TRANSPORT ROOM SERVED BY A SINTAMATIC MODEL SU-24H DUST COLLECTOR (2ND FLOOR)
N-1933-17-0	42,295 GALLONS	3020-05 C	1	135.00	135.00	D	OATBRAN STORAGE SILO #17 SERVED BY BIN VENT FILTERS. *** COMBINED WITH N-1933-1-0 ***
N-1933-18-0	42,295 GALLONS	3020-05 C	1	135.00	135.00	D	OATBRAN STORAGE SILO #18 SERVED BY BIN VENT FILTERS. *** COMBINED WITH N-1933-1-0 ***
N-1933-19-5	29.92 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	29.92 MMBTU/HR CLEAVER BROOKS MODEL CB-700-700-200 NATURAL GAS-FIRED BOILER WITH A CLEAVER BROOKS MODEL INTEGRAL ULTRA LOW NOX BURNER

Detailed Facility Report
For Facility=1933
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1933-20-4	29.92 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	29.92 MMBTU/HR NATURAL GAS-FIRED CLEAVER BROOKS, MODEL CB-700-700-200, BOILER (NO.2) WITH A CLEAVER BROOKS MODEL NTI-700 ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM
N-1933-21-1	115.2 HP Electric motors	3020-01 D	1	314.00	314.00	A	TACK SYSTEM CONSISTING OF A DIVERTER FROM THE EXISTING GRAPE NUTS FINISHED PRODUCT LINE (N-1933-4); SURGE BIN; WEIGH BELT SCALE; GRADER ASSEMBLY; TACK GRINDER ASSEMBLY; FINES GRINDER ASSEMBLY; PNEUMATIC CONVEYING SYSTEMS TO SILO #9; AND COATING REELS
N-1933-26-0	70 hp Electric motors	3020-01 C	1	197.00	197.00	A	BRAN SILO #3 AND BRAN GRINDING OPERATION SERVED BY A MAC MODEL 39AVRC32 DUST COLLECTOR; BRAN RECEIVER AND 2,200 LB GROUND BRAN STORAGE TANK SERVED BY A MAC MODEL 19AVRC7 DUST COLLECTOR; 1,000 LB STORAGE TANK SERVED BY A BIN VENT FILTER; SIFTER; BRAN FEEDER SYSTEM; AND ASSOCIATED AIRWAYS

Number of Facilities Reported: 1

**Attachment C
Exempt Equipment**

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

COMPANY NAME: POST FOODS, LLC

FACILITY ID: N -1933

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 ² 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 organic 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 D
Permits to Operate



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

Permit to Operate

FACILITY: N-1933

EXPIRATION DATE: 07/31/2014

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

POST FOODS, LLC
901 E WHITMORE AVE
MODESTO, CA 95358-9408

FACILITY LOCATION:

901 E WHITMORE
MODESTO, CA 95358

FACILITY DESCRIPTION:

CEREAL BREAKFAST FOODS

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-1933-0-0

EXPIRATION DATE: 07/31/2014

FACILITY-WIDE REQUIREMENTS

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]

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: POST FOODS, LLC
Location: 901 E WHITMORE, MODESTO, CA 95358
N-1933-0-0; Oct 2 2012 8:25AM - KAHLOUJ

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-1-1

EXPIRATION DATE: 07/31/2014

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

BULK RECEIVING AND STORAGE OPERATIONS CONSISTING OF TWO RECEIVING BINS (A AND B) SERVED BY A PNEUMATIC RAILCAR UNLOADING SYSTEM, AND A TRUCK WHEAT RECEIVING BIN SERVING 15 STORAGE SILOS VIA A PNEUMATIC CONVEYING SYSTEM

PERMIT UNIT REQUIREMENTS

1. The receiving and storage systems consist of two receiving bins (A and B) served by a pneumatic railcar unloading system and a truck wheat receiving bin. Both receiving bins A and B, via a pneumatic conveying system, serve 15 storage silos. [District Rule 2201]
2. Each of the silos (silos #2 through #5, #7, #8, #9, and #11 through #18) shall be vented to its own dust collector. Two silos shall be vented to General Resource Group 14054.8 dust collectors. Three silos shall be vented to DCE SU24HS4 dust collectors. Ten silos shall be vented to DCE C24HF6 dust collectors. [District Rule 2201]
3. Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
4. Replacement bags or cartridges numbering at least 10% of the total number of bags or cartridges in the largest dust collector using each type of bag or cartridge shall be maintained on the premises. [District Rule 2201]
5. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
6. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201]
7. The quantity of material received in each of the silos shall not exceed 120 tons per silo per day. [District Rule 2201]
8. Visible emissions from each dust collector shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
9. The PM10 emissions shall not exceed 0.0008 pounds per ton of material received. [District Rule 2201]
10. A daily log shall be maintained on the premises indicating the amount and type of material received in each of the silos. [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-1933-2-1

EXPIRATION DATE: 07/31/2014

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

RAW GRAIN CLEANING AND PROCESSING OPERATION CONSISTING OF WHITE WHEAT PROCESSING, BARLEY PROCESSING, AND 15 STORAGE SILOS

PERMIT UNIT REQUIREMENTS

1. The white wheat processing operation consists of: (sixth floor) three receiving bins; (fifth floor) wheat separator vibrator, three separators, wheat bin, cracking system; (fourth floor) two surge bins, a destoner; (third floor) and a concentrator. [District Rule 2080]
2. The white wheat processing equipment except the destoner are vented to a General Resource Group 14054.8 dust collector and DCE, Inc. Model UNC 160H R dust collector (third floor). The destoner is vented to a General Resource Group 14024.6 dust collector (third floor). [District Rule 2201]
3. The barley processing operation consists of: (fifth floor) a receiving bin, a separator, 14 screen filter; (fourth floor) a surge bin, two breaks, impact finisher, auger; (third floor) a hammer mill, a lifter; (second floor) and a flour storage bin. [District Rule 2080]
4. The above barley processing equipment is vented to a General Resource Group 14030.6 dust collector (fifth floor). [District Rule 2080]
5. The barley processing operation also consists of: (fifth floor) a 7 screen filter vented to a General Resource Group 14009.6 dust collector (fifth floor). [District Rule 2080]
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]
7. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
8. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201]
9. 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]
10. The quantity of grain processed through the white wheat processing operation shall not exceed 150 tons in any one day. [District Rule 2201]
11. Visible emissions from the dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
12. PM10 emissions from the General Resource 14054.8 and the DCE, Inc. Model UNC 160H R dust collectors serving the white wheat processing equipment shall not exceed 0.002 pounds per ton of grain processed. [District Rule 2201]
13. Daily records shall be maintained and shall include: (a) The date; (b) The quantity of grain processed through the white wheat processing operation in tons. [District Rule 1070]

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

14. 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-1933-3-9

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

BRAN FLAKES CEREAL PROCESSING OPERATION CONSISTING OF STORAGE BINS, BLENDERS, SIFTERS, MINOR INGREDIENT PNEUMATIC CONVEYING SYSTEM SERVED BY A PNEU-CON PNEUMATIC CONVEYING MODEL CP2000 DUST COLLECTOR, TWO STEAM HEATED COOKERS, ONE 8.0 MMBTU/HR NATURAL GAS FIRED ROTO-LOUVRE DRYER, FOUR CEREAL FLAKERS, TWO STEAM HEATED DRYERS, GRINDERS, SHAKERS, AND PACKAGING EQUIPMENT VENTED TO VARIOUS DUST COLLECTORS; FIVE COATING REELS VENTED TO ROTOCLONE CENTRIFUGAL COLLECTORS; ONE 8.0 MMBTU/HR AEROGLIDE MODEL C1 120 66 RGC FINISHED FLAKES CEREAL DRYER AND COOLER VENTED TO A HORIZON SYSTEMS, INC. MODEL 4HE32 HIGH EFFICIENCY MULTICYCLONES IN PARALLEL AND ASSOCIATED CONVEYING EQUIPMENT

PERMIT UNIT REQUIREMENTS

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. 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]
5. 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]
6. 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]
7. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The quantity of cereal flakes ingredients processed through the cereal flakes processing operation shall not exceed 190 tons during any one day. [District Rule 2201]
10. PM10 emissions from the cereal flakes processing operations served by baghouses shall not exceed 0.012 pounds per ton of cereal flakes ingredients processed. [District Rule 2201]
11. The emission rates from the Roto-Louvre dryer, shall not exceed any of the following limits: 4.3 ppmv NOx, dry, corrected to 19% O2, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 20.0 ppmv CO, dry, corrected to 19% O2, 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4309]
12. The combined quantity of bran flakes processed through the five bran coating reels shall not exceed 180 tons during any one day. [District Rule 2201]
13. PM10 emission rate from the rotoclone wet centrifugal collectors serving the coating reels shall not exceed 0.01 pounds per ton of cereal flakes processed. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The emission rates from the Aeroglide dryer shall not exceed any of the following limits: 2.1 ppmv NO_x, dry, corrected to 19% O₂, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 20.0 ppmv CO, dry, corrected to 19% O₂, 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4309]
15. The quantity of cereal flakes processed through the Aeroglide finished cereal flakes dryer/cooler shall not exceed 180 tons during any one day. [District Rule 2201]
16. The PM₁₀ emission rate (excluding PM₁₀ emissions due to the combustion of natural gas) from the cyclones serving the Aeroglide finished cereal flakes dryer/cooler shall not exceed 0.002 pounds per ton of bran flakes processed. [District Rule 2201]
17. The quantity of minor ingredient dispensed using pneumatic conveying system shall not exceed 11 tons during any one day. [District Rule 2201]
18. PM₁₀ emissions from the pne-con dust collector serving the pneumatic conveying system shall not exceed 0.00034 pounds per ton of material conveyed. [District Rule 2201]
19. The Aeroglide and Rot-Louvre dryers shall each be only fired on PUC quality natural gas. [District Rules 2201 and 4309]
20. Visible emissions from the dust collectors, baghouses, cyclones, or rotoclones (wet centrifugal collectors) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
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 NO_x and CO emissions from the Aeroglide dryer and the Rot-Louvre dryer shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
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_x 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 (O₂) 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_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309]
30. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ for the Aeroglide and Rot-Louvre dryers 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 dryer is not in operation, i.e. dryer need not be started solely to perform monitoring. Monitoring shall be performed within five days of restarting the dryer unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

31. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309]
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]
33. The permittee shall maintain the following records for Aeroglide and Rot-Louvre dryers: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer for each dryer, (4) exhaust gas analyzer calibration records, and (5) description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
34. The permittee shall maintain a daily record of the following: (a) Total quantity of cereal flakes ingredients processed in tons/day; (b) Total quantity of cereal flakes processed through the five coating reels served by rotoclones in tons/day; (c) Total quantity of cereal flakes processed through the Aeroglide finished cereal flakes dryer in tons/day; (d) Total quantity of minor ingredient conveyed through the pneumatic conveying system in tons/day. [District Rule 2201]
35. 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 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-1933-4-1

EXPIRATION DATE: 07/31/2014

SECTION: **TOWNSHIP:** MO **RANGE:**

EQUIPMENT DESCRIPTION:

GRAPE NUT PROCESS LINES 5, 9, 10, 11, AND 12 WITH A DIVERTER FROM THE GRAPE NUTS SURGE BIN TO DIVERT THE GRAPE NUTS TO THE PACKAGING LINE OR THE TACK SYSTEM (N-1933-21)

PERMIT UNIT REQUIREMENTS

1. System #5 consists of two fines bins each vented to a Flex Kleen dust collector (fourth floor). These bins are served by a General Resource Group baghouse (fifth floor). [District Rule 2201]
2. System #9 consists of a flour blending and conveying operation (second floor) vented to a General Resource Group baghouse (fifth floor). Conveyed material is collected in a Flex Kleen collector and weigh bin (sixth floor), and a dough mixing operation. [District Rule 2201]
3. System #10 consists of a dough baking operation (fourth floor). [District Rule 2201]
4. System #11 consists of dryer A (including shredding third floor) and dryer B (second floor) all vented to a General Resource Group baghouse (sixth floor). [District Rule 2201]
5. System #12 consists of a bucket elevator serving dryer B and serving the unground surge bin (fifth floor vented to a General Resource Group baghouse (fifth floor). [District Rule 2201]
6. 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]
7. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
8. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
10. Visible emissions from each of the dust collectors shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-5-0

EXPIRATION DATE: 07/31/2014

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

GRAPE NUT PROCESS LINES 13 AND 14 SERVED BY TWO GENERAL RESOURCES BAGHOUSES (THIRD AND FIFTH FLOORS)

PERMIT UNIT REQUIREMENTS

1. 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]
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-6-5

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

GUN PUFFED PRODUCT PROCESSING OPERATION CONSISTING OF STORAGE BINS, BLENDERS, EXTRUDERS, ONE 1.2 MMBTU/HR NATURAL GAS-FIRED PELLET DRYER, ONE 0.5 MMBTU/HR NATURAL GAS-FIRED PELLET HEATER, ONE STEAM HEATED PUFFING GUN, ONE GUN PUFFED EXPANSION CHAMBER WITH A 1.0 MMBTU/HR NATURAL GAS-FIRED BURNER, PUFF BINS, FINISHED PRODUCT BINS, AND PACKAGING EQUIPMENT VENTED TO VARIOUS DUST COLLECTORS; TWO COATING REELS VENTED TO ROTOCONE CENTRIFUGAL COLLECTORS; TWO 3 MMBTU/HR NATURAL GAS-FIRED AEROGlide MODEL C1 45 63 RGC(E) PRE-SWEET PUFFED CEREAL DRYERS AND COOLER EACH VENTED TO A HORIZON SYSTEMS, INC. MODEL #2HE30 HIGH EFFICIENCY MULTICYCLONES IN PARALLEL

PERMIT UNIT REQUIREMENTS

1. Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. 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. 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]
3. Replacement bags or cartridges numbering at least 10% of the total number of bags or cartridges in the largest dust collector using each type of bag or cartridge shall be maintained on the premises. [District Rule 2201]
4. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
5. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. The quantity of puff cereal processed and packaged shall not exceed 120 tons during any one day. [District Rule 2201]
7. The quantity of sugar processed through the 6th floor sugar receiving bin shall not exceed 14.6 tons during any one day. [District Rule 2201]
8. The amount of material received in the barley receiver bin shall not exceed 20 tons in any one day. [District Rule 2201]
9. The PM10 emissions from the puff cereal processing operations (excluding PM10 emissions from sugar and barley flour receiving and excluding PM10 emissions due to the combustion of natural gas) shall not exceed 0.068 pounds per ton of puff cereal processed. [District Rule 2201]
10. The PM10 emissions from the baghouse serving the 6th floor sugar receiving bin shall not exceed 0.003 pounds per ton of sugar processed. [District Rule 2201]
11. The PM10 emissions shall not exceed 0.016 pounds per ton of barley flour received through the barley receiver bin. [District Rule 2201]
12. The NOx emission rate due to the combustion of natural gas from each Aeroglide finished puff cereal dryer shall not exceed 20 ppmv, dry, corrected to 3% O2 (equivalent to 0.20 lb/hr). [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The CO emission rate due to the combustion of natural gas from each Aeroglide finished cereal flakes dryer shall not exceed 80 ppmv, dry, corrected to 3% O₂. [District Rule 2201]
14. The PM₁₀ emission rate due to the combustion of natural gas from each Aeroglide finished puff cereal dryer shall not exceed 0.0076 lb/MMBTU. [District Rule 2201]
15. The SO_x emission rate due to the combustion of natural gas from each Aeroglide finished puff cereal dryer shall not exceed 0.00285 lb/MMBTU. [District Rule 2201]
16. The VOC emission rate due to the combustion of natural gas from each Aeroglide finished puff cereal dryer shall not exceed 0.0055 lb/MMBTU. [District Rule 2201]
17. Visible emissions from the dust collectors, baghouses, cyclones, or Rotoclone wet centrifugal collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
18. The permittee shall maintain a daily record of the following: (a) Total quantity of puff cereal processed in tons/day; (b) Total quantity of sugar processed through the 6th floor sugar receiving bin in tons/day; (c) Total quantity of barley flour received in the barley receiver bin in tons/day. [District Rule 2201]
19. 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-1933-7-3

EXPIRATION DATE: 07/31/2014

SECTION: **TOWNSHIP:** MO **RANGE:**

EQUIPMENT DESCRIPTION:

RECLAIM OPERATION CONSISTING OF ONE FEED HOPPER, ONE AUGER DIVERTER AND TWO GRINDERS VENTED TO A GENERAL RESOURCES MODEL 14030.6 BAGHOUSE; AND A PNEUMATIC CONVEYING SYSTEM SERVING SILO #1 VENTED TO A DCE MODEL C72HK BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Each 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. 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]
3. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
5. No more than 75 tons of material shall be processed and transferred into the silo in any one day. [District Rule 2201]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
7. Visible emissions from each baghouse serving the reclaim process shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
8. The PM10 emission rate from the silo shall not exceed 0.0027 pounds per ton of material transferred into the silo. [District Rule 2201]
9. The PM10 emission rate from the General Resources model 14030.6 baghouse serving the material input and grinding operations shall not exceed 0.006 pounds per ton of material processed. [District Rule 2201]
10. A daily record of the amount of material transferred into the silo shall be maintained at all times. [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-1933-12-1

EXPIRATION DATE: 07/31/2014

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

GRAIN CLEANING, MILLING, STORAGE, AND ASSOCIATED CONVEYING SYSTEMS

PERMIT UNIT REQUIREMENTS

1. Grain Cleaning and Conveying System: This system includes 3 Buhler cyclones, a Buhler MANV-280 separator and Buhler MTMA-1500A aspirator channel, a Buhler MTRI 90/150 RX indent separator, a Buhler combinator MTCD 64/150, a Buhler MTC-100 gravity table, a Buhler MJZD detacher, a Buhler MHXF-30/150 scourer, a Buhler aspirator MVSO-100, a dampening auger and a tampering bin. Except the dampening auger and a tampering bin, all units shall be vented to a General Resource 14048.6 (3H) dust collector. The product (i.e. overs, seeds, or other similar products) collected by these units shall be pneumatically conveyed into silo #1 served by a Sintamatic DCE C72-HK11 dust collector. [District Rule 2201]
2. Grain Milling and Conveying System: This system includes 3 Buhler MDDK-10/40 roller mills, 7 Buhler cyclones (3 Buhler cyclone for roller mill 1, 2 Buhler cyclone for roller mill 2, and 2 Buhler cyclone for roller mill 3), 1 Great Western 4x22 sifter, 3 Buhler MKLA-45/100 dusters, and 2 Buhler MAEF scales. All these units shall be vented to a General Resource 58CT8 (4F) dust collector. [District Rule 2201]
3. Flour Conveying and Storage System: This system consists of pneumatic conveying of flour into silo #12 served by a Sintamatic DCE C24-HF6AD dust collector, pneumatic conveying of flour into silo #18 served by a Sintamatic DCE SU24-HS4AD dust collector, and pneumatic conveying of flour into silo #10 served by a Horizon Systems Inc 58RF14 dust collector. [District Rule 2201]
4. Bran Conveying and Storage System: This system consists of pneumatic conveying of bran to silo #1 served by a Sintamatic DCE C72-HK11 dust collector, pneumatic conveying of bran to silo #3 served by a Sintamatic DCE C24-HF6AD dust collector, and mechanical or gravity conveying to bran grinding operation. [District Rule 2201]
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. 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]
7. Replacement bags or cartridges numbering at least 10% of the total number of bags or cartridges in the largest dust collector using each type of bag or cartridge shall be maintained on the premises. [District Rule 2201]
8. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The cleaning frequency and duration of each dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201]
10. Visible emissions at the exhaust of each dust collector system shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
11. Particulate matter emissions, at exhaust of each dust collector, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
12. The combined amount of flour and bran production shall not exceed 170 tons during any one day. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The total PM10 emissions from the systems under this permit shall not exceed 0.105 pounds per ton of the total flour and bran produced. [District Rule 2201]
14. The permittee shall keep records of date and the amount of flour and bran produced. [District Rule 2201]
15. All records shall be maintained and retained on-site for a period of at least 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-1933-15-1

EXPIRATION DATE: 07/31/2014

SECTION: **TOWNSHIP:** MO **RANGE:**

EQUIPMENT DESCRIPTION:

SUGAR STORAGE SILO #6 SERVED BY A SINTAMATIC MODEL SU-40HS5AD DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filter elements. The gauge shall be maintained in working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
2. Replacement filter elements numbering at least 10% of the total number of filter elements in the largest dust collector using each type of filter element shall be maintained on the premises. [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. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
5. The quantity of sugar loaded into the storage silo shall not exceed 540 tons in any one day. [District Rule 2201]
6. There shall be no visible emissions from the dust collector. [District NSR Rule]
7. PM10 emissions shall not exceed 0.01 pounds per ton of sugar loaded into the storage silo. [District Rule 2201]
8. 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-1933-16-0

EXPIRATION DATE: 07/31/2014

SECTION: **TOWNSHIP:** MO **RANGE:**

EQUIPMENT DESCRIPTION:

SUGAR AND FRUCTOSE BLENDING AND TRANSPORT ROOM SERVED BY A SINTAMATIC MODEL SU-24H DUST COLLECTOR (2ND FLOOR/)

PERMIT UNIT REQUIREMENTS

1. The Sintamatic dust collection systems shall be equipped with a pressure gauge to indicate the pressure drop between the filters. The gauge shall be maintained in good working condition at all times. [District Rule 2201]
2. A spare set of filter elements shall be maintained on the premises at all times. [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. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-19-5

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

29.92 MMBTU/HR CLEAVER BROOKS MODEL CB-700-700-200 NATURAL GAS-FIRED BOILER WITH A CLEAVER BROOKS MODEL INTEGRAL ULTRA LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be utilized and maintained. [40 CFR 60.48c(g)]
5. NOx emissions shall not exceed 7 ppmvd @ 3% O2 (0.008 lb/MMBtu) referenced as NO2. [District Rules 2201, 4305, 4306 and 4320]
6. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
7. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
8. CO emissions shall not exceed 400 ppmvd @ 3% O2 (0.296 lb/MMBtu). [District Rules 2201, 4305, 4306 and 4320]
9. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306]
11. This unit shall be tested for compliance with the NOx and CO emissions limits at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 4305, 4306 and 4320]
12. 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]
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. 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]
15. NOx 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
17. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
19. The flue gas recirculation rate shall be determined at least on a weekly basis by measuring the stack temperature (T_s), windbox temperature (T_w), and ambient temperature (T_a) and using the following equation: $FGR \text{ rate} = \frac{T_w - T_a}{T_s - T_a} \times 100\%$. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306, 4320]
20. The minimum flue gas recirculation rate shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be no lower than the minimum flue gas recirculation rate with which compliance with applicable NO_x and CO emission limits has been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306 and 4320]
21. If the flue gas recirculation rate is less than the normal range/level, the permittee shall return the flue gas recirculation rate to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation rate. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. 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]
22. The permittee shall maintain records of the date and time of temperature measurements, the measured temperatures, the calculated flue gas recirculation rate, and the firing rate at the time of the temperature measurements. The records shall also include a description of any corrective action taken to maintain the flue gas recirculation rate within the acceptable range. [District Rules 4305, 4306 and 4320]
23. The permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler. [40 CFR 60.48c(g)]
24. 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]
25. 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, 4305, 4306 and 4320 and 40 CFR 60c(i)]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-20-4

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

29.92 MMBTU/HR NATURAL GAS-FIRED CLEAVER BROOKS, MODEL CB-700-700-200, BOILER (NO.2) WITH A CLEAVER BROOKS MODEL NTI-700 ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be utilized and maintained. [40 CFR 60.48c(g)]
5. NO_x emissions shall not exceed 7 ppmvd @ 3% O₂ (0.008 lb/MMBtu) referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320]
6. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
7. PM₁₀ emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
8. CO emissions shall not exceed 100 ppmvd @ 3% O₂ (0.074 lb/MMBtu). [District Rules 2201, 4305, 4306 and 4320]
9. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306]
11. This unit shall be tested for compliance with the NO_x and CO emissions limits at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 4305, 4306 and 4320]
12. 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]
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. 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]
15. NO_x 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
17. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
19. The flue gas recirculation rate shall be determined at least on a weekly basis by measuring the stack temperature (T_s), windbox temperature (T_w), and ambient temperature (T_a) and using the following equation: $FGR \text{ rate} = \{(T_w - T_a)/(T_s - T_a)\} \times 100\%$. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306, 4320]
20. The minimum flue gas recirculation rate shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be no lower than the minimum flue gas recirculation rate with which compliance with applicable NO_x and CO emission limits has been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306 and 4320]
21. If the flue gas recirculation rate is less than the normal range/level, the permittee shall return the flue gas recirculation rate to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation rate. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. 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]
22. The permittee shall maintain records of the date and time of temperature measurements, the measured temperatures, the calculated flue gas recirculation rate, and the firing rate at the time of the temperature measurements. The records shall also include a description of any corrective action taken to maintain the flue gas recirculation rate within the acceptable range. [District Rules 4305, 4306 and 4320]
23. The permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler. [40 CFR 60.48c(g)]
24. 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]
25. 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, 4305, 4306 and 4320 and 40 CFR 60c(i)]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-21-1

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

TACK SYSTEM CONSISTING OF A DIVERTER FROM THE EXISTING GRAPE NUTS FINISHED PRODUCT LINE (N-1933-4); SURGE BIN; WEIGH BELT SCALE; GRADER ASSEMBLY; TACK GRINDER ASSEMBLY; FINES GRINDER ASSEMBLY; PNEUMATIC CONVEYING SYSTEMS TO SILO #9; AND COATING REELS

PERMIT UNIT REQUIREMENTS

1. The surge bin, weigh belt scale, grader assembly, tack grinder assembly, and fines grinder assembly shall be vented to a MAC 19FRBC7 cartridge dust collector during operation. [District Rule 2201]
2. The fines from this operation are pneumatically conveyed to Silo #9. [District Rule 2201]
3. The finished "tack" material is pneumatically conveyed to the two coating reels of N-1933-6. [District Rule 2201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. Material removed from dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
6. The cleaning frequency and duration of the dust collector shall be adjusted to optimize the control efficiency. [District NSR Rule]
7. Replacement cartridges numbering at least 10% of the total number of cartridges in this dust collector shall be maintained on the premises. [District Rule 2201]
8. The amount of material processed shall not exceed 8 tons/day. [District Rule 2201]
9. Visible emissions from the dust collector shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule]
10. The PM10 emissions concentration shall not exceed 0.012 pounds per ton of material processed. [District Rule 2201]
11. Permittee shall maintain a daily record of the quantity of material processed. [District Rule 2201]
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]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-26-0

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

BRAN SILO #3 AND BRAN GRINDING OPERATION SERVED BY A MAC MODEL 39AVRC32 DUST COLLECTOR; BRAN RECEIVER AND 2,200 LB GROUND BRAN STORAGE TANK SERVED BY A MAC MODEL 19AVRC7 DUST COLLECTOR; 1,000 LB STORAGE TANK SERVED BY A BIN VENT FILTER; SIFTER; BRAN FEEDER SYSTEM; AND ASSOCIATED AIRWAYS

PERMIT UNIT REQUIREMENTS

1. Air displaced from receiver cyclone #1 shall be vented to a MCA 19AVRC7 dust collector prior to being discharged to atmosphere. [District Rule 2201]
2. Air displaced from receiver cyclone #2 shall be vented to a MCA 19AVR32 dust collector prior to being discharged to atmosphere. Dust collector MCA 19AVR32 shall also serve bran grinder. [District Rule 2201]
3. Bran receiving and processing operation throughput shall not exceed 9.6 ton/day. [District Rule 2201]
4. Visible emissions from baghouse(s) serving this operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District NSR Rule]
5. Bran receiving and processing operation PM10 emissions shall not exceed 0.05 lb/ton of material processed. [District Rule]
6. Permittee shall maintain records of daily and annual amounts of bran processed. [District Rule 1070]
7. 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.

Attachment E
Pre-Control Emission Calculations

Pre-Control Emissions for 1933-12 (CAM Purpose)

Item	Source Operation/Emissions Unit	Control Equipment	EF (Uncontrolled)	Throughput	PE2	PE2	Source of EF
		(Y/N)	lb-PM ₁₀ /ton	tons/day	lb/day	lb/yr	comments
1	pneumatic dispensing of wheat grains from silo #15, #16, and broken bins into units listed in next item using Buhler cyclone, which is vented to a General Resource (GR) 14048.6 dust collector	Y	0.0063	170	1.1	402	EPA's AP-42 Table 9.9.1-1 (3/03), storage bin vent
2	enclosed Buhler MANV-280 intermediate separator and Buhler MTMA-1500 aspiration channel. It is a one package unit vented to GR 14048.6 dust collector. Intermediate separator remove coarse objects from the grains, and the aspiration channel removes straw, dust, or hull fragments.	Y	0.00696	170	1.2	438	EPA's AP-42 Table 9.9.1-2 (3/03), wheat flour mills - cleaning house separator, EF for the cyclone serving the separators is 0.012 lb-PM/ton of material; 29% of PM is assumed to be PM ₁₀ ; cyclone control efficiency is assumed to be 50%; therefore, the uncontrolled EF would be 0.00696 lb-PM ₁₀ /ton of material [0.012 lb-PM/ton x 0.29 lb-PM ₁₀ /lb-PM x 1/0.50]
3	enclosed material transfer from the aspiration channel to Buhler MTR1 90/150 RK indent separator	N	--	170	--	--	EPA's AP-42 Table 11.19.2-2, conveyor transfer point, controlled
4	Buhler MTR1 90/150 RK indent separator to remove long grains from granular products or foreign seed removal system vented to GR 14048.6 dust collector	Y	0.00696	170	1.2	438	same as item 2
5	pneumatic material transfer to a Buhler combinator MTCD-64/150 using Buhler cyclone, which is vented to a GR 14048.6 dust collector	Y	0.0063	170	1.1	402	same as item 1
6	Buhler combinator MTCD-64/150 vented to GR 14048 dust collector. This unit is a screen deck to separate heavy and lighter particles; this unit also functions as a	Y	0.00696	170	1.2	438	same as item 2
7	enclosed, gravity-fed, material transfer from the combinator to Buhler gravity table MTC-100	N	--	170	--	--	same as item 3
8	Buhler gravity table MTC-100 vented to GR 14048 dust collector. This unit separates granular material into heavy, light, and mixed fractions.	Y	0.00696	170	1.2	438	same as item 2
9	enclosed (gravity fed) material transfer to either Buhler detacher MJZD-43/AP or Buhler scourer MHXF-30/150	N	--	170	--	--	same as item 3
10	Buhler detacher MJZD-43/AP served by GR 14048.6 dust collector. This unit is a spinning plate system for killing bugs; or Buhler scourer MHXF-30/150 served by GR 14048.6 dust collector. This unit is a rotary screen to remove dust, sand etc that adhere to the grains.	Y	0.00696	170	1.2	438	same as item 2
11	pneumatic material transfer from the detacher or scourer to a Buhler aspirator MVSO-100 using Buhler cyclone, which is vented to a GR 14048.6 dust collector	Y	0.0063	170	1.1	402	same as item 1
12	Buhler aspirator MVSO-100 vented to GR 14048.6 dust collector. This unit is used to remove lighter particles such as dust or hull fragments.	Y	0.00696	170	1.2	438	same as item 2

Pre-Control Emissions for 1933-12 (CAM Purpose)

Item	Source Operation/Emissions Unit	Control Equipment	EF (Uncontrolled)	Throughput	PE2	PE2	Source of EF comments
		(Y/N)	lb-PM ₁₀ /ton	tons/day	lb/day	lb/yr	
13	enclosed, gravity-fed, material transfer from the aspirator to the dampening screw auger where water is added to mill grains	N	--	170	--	--	same as item 3
14	enclosed, gravity-fed, material transfer from the the dampening screw auger to the tempering bin	N	--	170	--	--	same as item 4
15	enclosed, gravity-fed, material transfer from the tempering bin to roller mill #1	N	--	170	--	--	same as item 5
16	Buhler MDDK-10/40 roller mill #1 and pneumatic transfer of the material transfer to the sifter using 3 Buhler cyclones. These cyclones are vented to GR 58CT8 dust collector.	Y	20.3	170	3451	1,259,615	EPA's AP-42 Table 9.9.1-2 (3/03), wheat flour mills - roller mill, EF is 70 lb-PM/ton of material; Per CARB's PM ₁₀ speciation manual, 29% of PM is PM ₁₀ ; Therefore, the uncontrolled emission factor would be 20.3 lb-PM ₁₀ /ton of material [70 lb-PM/ton x 0.29 lb-PM ₁₀ /lb-PM]
17	Great Western 4x22 sifter vented to GR 58 CT8 dust collector. This system separate correct sized flour from flour that needs further milling.	Y	0.00696	170	1.2	438	same as item 2
18	enclosed, gravity-fed, material transfer of spec met product transfer into dusters	N	--	170	--	--	same as item 3
19	enclosed, gravity-fed, material transfer of over-spec material from the sifter to roller mill #2	N	--	170	--	--	same as item 4
20	Buhler MDDK-10/40 roller mill #2 and pneumatic material transfer from the roller mill #2 to the sifter using 2 Buhler cyclones. These cyclones are vented to GR 58CT8 dust collector.	N	--	--	--	--	emissions are accounted in item 16
21	Great Western 4x22 sifter vented to GR 58 CT8 dust collector. This system separate correct sized flour from flour that needs further milling.	N	--	--	--	--	emissions are accounted in item 17
22	enclosed, gravity-fed, material transfer of spec met product transfer into dusters	N	--	--	--	--	emissions are accounted in item 18
23	enclosed, gravity-fed, material transfer of over-spec material from the sifter to roller mill #3	N	--	--	--	--	emissions are accounted in item 19
24	Buhler MDDK-10/40 roller mill #3 vented to vented to a General Resource (GR) 58CT8 dust collector	N	--	--	--	--	emissions are accounted in item 16
25	pneumatic material transfer from the roller mill #3 to the sifter using 2 Buhler cyclones. These cyclones are vented to GR 58CT8 dust collector.	N	--	--	--	--	emissions are accounted in item 17
26	Great Western 4x22 sifter vented to GR 58 CT8 dust collector. This system separate correct sized flour from flour that needs further milling.	N	--	--	--	--	emissions are accounted in item 18
27	enclosed, gravity-fed, material transfer of spec met product transfer into dusters	N	--	170	--	--	same as item 4

Pre-Control Emissions for 1933-12 (CAM Purpose)

Item	Source Operation/Emissions Unit	Control Equipment (Y/N)	EF (Uncontrolled) lb-PM ₁₀ /ton	Throughput tons/day	PE2 lb/day	PE2 lb/yr	Source of EF comments
28	3 Buhler MKLA-45/110 dusters served by GR 58CT8 dust collector. These are rotary screens with to separate flour from bran	Y	0.00696	170	1.2	438	same as item 2
29	enclosed, gravity fed, flour transfer from the dusters to Buhler MAEF scale	N	--	170	--	--	same as item 4
30	enclosed, gravity fed, bran transfer from the dusters to another Buhler MAEF scale	N	--	170	--	--	same as item 5
31	pneumatic conveying of flour from the scale to silo #12, #18 and #10. Each silo is equipped with a dust collector system.	Y	0.36	166.6	60	21,900	referenced from permit N-298-5 (0.0036/(1-0.99))
32	pneumatic conveying of bran from the scale to either silo #3, #1, or bran grinding operation. Each silo is equipped with a dust collector system.	Y	0.111	3.4	0.4	146	The emission factor is determined by adjusting the weight density of the wheat flour and bran as follows: 0.36 lb-PM ₁₀ /ton x 16 lb/ft ³ for bran/52 lb/ft ³ for flour = 0.111 lb-PM ₁₀ /ton of material