

South Coast Air Quality Management District

Statement of Basis

Proposed Renewal Title V Permit

Facility Name:	Baker Commodities, Inc.
Facility ID:	800016
SIC Code:	2047
Equipment Location:	4020 Bandini Blvd. Vernon, CA 90058
Application #(s):	547384
Application Submittal Date(s):	08/30/11
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, and lead are in attainment with federal standards. The status of CO is currently serious nonattainment, but AQMD has petitioned to EPA for re-designation to

attainment status. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Baker Commodities located at 4020 Bandini Blvd., Vernon. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that is in the business of rendering animal matter into product such as tallow and meat meal. They also process restaurant grease and oil into yellow grease; and operate a small on-site wastewater treatment facility. They operate several large boilers to supply heat and as control equipment to abate odors.

3. Construction and Permitting History

The facility has been in constant operation since 1937. Numerous permits to construct and permits to operate have been issued to the facility since 4/24/56. An initial Title V permit was issued to the facility on 10/05/01 and a renewal Title V permit was issued to the facility on 4/19/2007.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS or NESHAP requirements.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

There are no permitted units at this facility with pre- or post-control emissions of at least 100% of the major source threshold amount. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

**Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2011**

Pollutant	Emissions (tons/year)
CO	11.923
NOx	7.929
VOC	1.102
SOx	0.064
PM	1.009

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2009/2010**

The Following TACs Were Reported	Emissions, lbs/yr
Butadiene [1,3]	2.114
Ammonia	3465.33
Arsenic and Compounds (inorganic)	< 0.001
Benzene	9.903
Cadmium	< 0.001
Chromium, hexavalent (and compounds)	< 0.001
Formaldehyde	10.494
Lead compounds (inorganic)	< 0.001
Naphthalene [PAH, POM]	0.388
Nickel	0.007
PAHs, total, w/o individual components reported [PAH, POM]	0.021

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The AQMD is tracking the status of Baker Commodities under AB2588

8. Compliance History

As noted, the facility has been in constant operation since 1937. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had 1 Notice to Comply issued in the last two calendar years. The notice was to require calculating permit exempt equipment emissions using natural gas in lbs/MMCF not lbs/therms. Since then correction actions were taken after the notice was received, no compliance schedule was necessary.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.

10. Comments

Incorporated into this proposed permit is the addition of four storage tanks for grease and tallow along with their control equipment.