



APR 23 2012

Jay Pezoldt
Baker Commodities, Inc.
18801 W. Jensen Avenue
Kerman, CA 93630

**Re: Notice of Minor Title V Permit Modification
District Facility # C-72
Project # 1110539**

Dear Mr. Pezoldt:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-72-9-3 into the Title V operating permit. This ATC authorized the modification of their meat and bone meal storage and loadout operation by increasing the daily amount of meat and bone meal stored and loaded out from 346,000 pounds (173 tons) per day to 800,000 pounds (400 tons) per day to allow for logistics management of truck traffic.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-72-9-3, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



APR 23 2012

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # C-72
Project # 1110539

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Baker Commodities, Inc. is proposing a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-72-9-3 into the Title V operating permit. This ATC authorized the modification of their meat and bone meal storage and loadout operation by increasing the daily amount of meat and bone meal stored and loaded out from 346,000 pounds (173 tons) per day to 800,000 pounds (400 tons) per day to allow for logistics management of truck traffic.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-72-9-3, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,

David Warner
Director of Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: 1110539

Engineer: Dustin Brown
Date: April 19, 2012

Facility Number: C-72
Facility Name: Baker Commodities, Inc.
Mailing Address: 18801 W. Jensen Avenue
Kerman, CA 93630

Contact Name: Jay Pezoldt
Phone: (559) 237-4320

Responsible Official: Jay Pezoldt
Title: Assistant General Manager

I. PROPOSAL

Baker Commodities is proposing a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-72-9-3 into their Title V operating permit. This ATC authorized the modification of the meat and bone meal storage and loadout operation by increasing the daily amount of meat and bone meal stored and loaded out from 346,000 pounds (173 tons) per day to 800,000 pounds (400 tons) per day. The increase in the daily meat and bone meal throughput is necessary to allow for logistics management of truck traffic. The existing annual throughput limit of 82,344,000 pounds (41,172 tons) will remain unchanged.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

Baker Commodities is located at 16801 W. Jensen Avenue in Kerman, CA.

III. EQUIPMENT DESCRIPTION

C-72-9-3: MEAT AND BONE MEAL STORAGE AND LOADOUT SYSTEM EQUIPPED WITH ONE GRINDER, ONE ELEVATOR, THREE TRANSFER CONVEYORS, ONE FINISHED MATERIAL CONVEYANCE SCREW SYSTEM AND TWO MEAT AND BONE MEAL BINS

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Baker Commodities is proposing to modify their rendering plant by installing a third Dupps Model 1200 cooker. The facility is proposing an increase from 18.9 tons per hour (454 tons, or 908,000 lb per day) of raw material to 29.0 tons per hour (696 tons, or 1,392,000 pounds per day) of raw material. The annual limit of raw material will be limited to pre-project levels of 331,128,000 pounds (165,564 tons) per year. The change in daily meat and bone meal throughput is being made to allow for logistics management of daily truck traffic.

The proposed changes only result in daily PM₁₀ emission increases. No annual emission increases were associated with this modification.

Existing PTO Changes:

Existing PTO condition 1 has been removed as this condition is a duplicate condition of condition 42 on facility wide permit C-72-0-1.

Existing PTO condition 7 was revised in accordance with the District NSR rule and the requested increase in daily amount of meat and bone meal stored and loaded out in to trucks. The revised requirement has been included as condition 6 of the requirements for this revised permit.

Existing PTO condition 8 was revised in accordance with the District NSR rule and the requested increase in daily amount of meat and bone meal stored and loaded out in trucks. The revised requirement has been included as condition 7 of the requirements for this revised permit.

ATC Condition Changes:

ATC condition 1 is already included as condition 42 of Baker Commodities' facility wide permit, C-72-0-1. Therefore, it is not necessary to include the same condition on each permit and this condition was removed and is not included in the requirements for this revised permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permits C-72-9-4
- B. Authority to Construct C-72-9-3
- C. Application
- D. Previous Title V Operating Permit C-72-9-2

ATTACHMENT A

Proposed Modified Title V Operating Permit
C-72-9-4

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-72-9-4

EXPIRATION DATE: 06/30/2014

EQUIPMENT DESCRIPTION:

MEAT AND BONE MEAL STORAGE AND LOADOUT SYSTEM EQUIPPED WITH ONE GRINDER, ONE ELEVATOR, THREE TRANSFER CONVEYORS, ONE FINISHED MATERIAL CONVEYANCE SCREW SYSTEM AND TWO MEAT AND BONE MEAL BINS

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
2. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
4. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
5. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Total meat and bone meal stored and loaded out into delivery trucks shall not exceed either of the following limits: 800,000 pounds (400 tons) per day or 82,344,000 pounds (41,172 tons) per year. [District NSR Rule and District Rule 4102] Federally Enforceable Through Title V Permit
7. Daily emissions from the meat and bone meal (MBM) storage and truck loadout operation shall not exceed 1.3 lb-PM10/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Tallow and yellow grease storage tanks shall be kept in good operating condition. These tanks shall not contribute to a nuisance condition. [District Rule 4102]
9. Permittee shall keep daily and annual records of the amount of meat and bone meal stored and loaded out in to delivery trucks. [District NSR Rule] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Authority to Construct C-72-9-3



AUTHORITY TO CONSTRUCT

PERMIT NO: C-72-9-3

ISSUANCE DATE: 04/20/2011

LEGAL OWNER OR OPERATOR: BAKER COMMODITIES, INC

MAILING ADDRESS: PO BOX 416
KERMAN, CA 93630

LOCATION: 16801 W JENSEN AVE
KERMAN, CA 93630

EQUIPMENT DESCRIPTION:

MODIFICATION OF MEAT AND BONE MEAL STORAGE AND LOADOUT SYSTEM EQUIPPED WITH ONE GRINDER, ONE ELEVATOR, THREE TRANSFER CONVEYORS, ONE FINISHED MATERIAL CONVEYANCE SCREW SYSTEM AND TWO MEAT AND BONE MEAL BINS: INCREASE DAILY MEAT AND BONE MEAL STORAGE AND LOADOUT THROUGHPUT FROM 346,000 POUNDS (173 TONS) PER DAY TO 800,000 POUNDS (400 TONS) PER DAY

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
5. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
6. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services
C:\7293_Apr 20 2011 8:21AM - BROWNHD Joint Inspection NOT Required

7. Total meat and bone meal stored and loaded out into delivery trucks shall not exceed either of the following limits: 800,000 pounds (400 tons) per day or 82,344,000 pounds (41,172 tons) per year. [District NSR Rule and District Rule 4102] Federally Enforceable Through Title V Permit
8. Daily emissions from the meat and bone meal (MBM) storage and truck loadout operation shall not exceed 1.3 lb-PM10/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Tallow and yellow grease storage tanks shall be kept in good operating condition. These tanks shall not contribute to a nuisance condition. [District Rule 4102]
10. Permittee shall keep daily and annual records of the amount of meat and bone meal stored and loaded out in to delivery trucks. [District NSR Rule] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

ATTACHMENT C

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Received

MAR 16 2011

Permit Application For:

Permits Sp/0
SJVAPCD

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Baker Commodities, Inc.		
2. MAILING ADDRESS: STREET/P.O. BOX: <u>18801 W. Jensen Ave.</u>		
CITY: <u>Kerman</u>	STATE: <u>CA</u>	9-DIGIT ZIP CODE: <u>93630</u>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>18801 W. Jensen Ave</u> CITY: <u>Kerman</u> _____ 1/4 SECTION _____ TOWNSHIP _____ RANGE		INSTALLATION DATE: No physical modification needed. Change in throughput requested
4. GENERAL NATURE OF BUSINESS: Animal Rendering		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Request of change of condition to permit unit C-72-9-2, Condition #7 to increase daily meat and bone meal (MBM) truck loading to 800, 000 pounds (400 tons) per day. No physical modification to plant is needed. No increase to annual MBM loading is required. Modification is needed to accommodate existing on-site storage capacity and to allow for logistics management of truck traffic. No increase in plant process throughput or storage capacity is required. Modification will result in increased PTE of PM10 emissions of 0.37 lb/day		
6. TYPE OR PRINT NAME OF APPLICANT: Jay Pezold		TITLE OF APPLICANT: Plant Manager
7. SIGNATURE OF APPLICANT: <i>Jay Pezold</i>		DATE: <u>3-16-11</u>
		PHONE: () FAX: () EMAIL:

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: <u>\$0</u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>C-410561</u> FACILITY ID: <u>C-72</u>
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1110539

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Baker Commodities, Inc.	FACILITY ID: C - 72
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Baker Commodities, Inc.	
3. Agent to the Owner: Karl Lany, SCEC (714) 282-8240 x 40	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Jay E. Perzoldt
Signature of Responsible Official

3-16-11
Date

JAY E. PERZOLDT
Name of Responsible Official (please print)

ASSIST. GEN. MGR.
Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit C-72-9-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-72-9-2

EXPIRATION DATE: 06/30/2014

EQUIPMENT DESCRIPTION:

MEAT AND BONE MEAL STORAGE AND LOADOUT SYSTEM EQUIPPED WITH ONE (1) GRINDER, ONE (1) ELEVATOR, THREE (3) TRANSFER CONVEYORS, ONE FINISHED MATERIAL CONVEYANCE SCREW SYSTEM AND TWO (2) MEAT AND BONE MEAL BINS

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
5. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
6. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit
7. Total meat and bone meal loaded into delivery trucks shall not exceed 346,000 pounds (173 tons) per day or 82,344,000 (41,172 tons) per year. [District NSR Rule and District Rule 4102] Federally Enforceable Through Title V Permit
8. Daily emissions from the meat and bone meal (MBM) handling operation shall not exceed 0.4 lb PM10/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Tallow and yellow grease storage tanks shall be kept in good operating condition. These tanks shall not contribute to a nuisance condition. [District Rule 4102]
10. Permittee shall keep daily and annual records of the amount of meat and bone meal produced. [District NSR Rule] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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