



NOV 08 2011

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 # S-525**  
**Project # 1114380**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Land O'Lakes, Inc is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct (ATCs) S-525-38-4, '-39-7, '-47-0, and '-48-0 into the Title V operating permit. The ATCs authorize two new milk powder storage silos and the modification of two existing storage silos.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATCs) S-525-38-4, '-39-7, '-47-0, and '-48-0, 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. Leonard Scandura at (661) 392-5500.

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



NOV 08 2011

Douglas Findley  
Land O'Lakes, Inc  
400 South M Street  
Tulare, CA 93274

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-525  
Project # 1114380**

Dear Mr. Findley:

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 Authorities to Construct (ATCs) S-525-38-4, '-39-7, '-47-0, and '-48-0 into the Title V operating permit. The ATCs authorize two new milk powder storage silos and the modification of two existing storage silos.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATCs) S-525-38-4, '-39-7, '-47-0, and '-48-0, 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. Leonard Scandura at (661) 392-5500.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures

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Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1114380

Engineer: Richard Edgehill  
Date: November 3, 2011

Facility Number: S-525  
Facility Name: Land O' Lakes, Inc  
Mailing Address: 400 South M Street  
Tulare, CA 93274

Contact Name: Douglas W. Findley  
Phone: (661) 687-6653  
Title: Environmental Engineer  
Responsible Official: Stu Giffin, Western Region Director of Manufacturing  
Lead Engineer: Allan Phillips *AP SUPER AGUE* NOV 03 2011

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## I. PROPOSAL

Land O' Lakes Inc is proposing a Title V minor permit modification to incorporate Authorities to Construct (ATC) S-525-38-4, '-39-7, '-47-0, and '-48-0 authorizing two new milk powder storage silos and the modification of two existing storage silos.

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

The facility is located at 400 South M St, Tulare.

## III. EQUIPMENT DESCRIPTION

**S-525-38-5:** 50,000 GALLON DRY POWDER STORAGE SILO #6 WITH NUCON BIN VENT FILTER WITH 71.5 SQUARE FEET OF CLOTH AREA AND MAXIMUM FLOW OF 535 SCFM

**S-525-39-8:** 57,000 GALLON POWDER STORAGE SILO WITH TWO NUCON BIN VENT FILTERS; RECEIVING POWDER ONLY FROM S-525-43 AND DISCHARGING ONLY TO BAGGING OPERATIONS S-525-30, '-37, AND '-44

**S-525-47-1:** 25,689 GALLON DRY POWDER STORAGE SILO PS11 WITH  
NUCON BIN VENT FILTER

**S-525-48-1:** 25,689 GALLON DRY POWDER STORAGE SILO PS12 WITH  
NUCON BIN VENT FILTER

#### **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**

The base documents for S-525-38-5 and '-39-8 are the current PTOs.

Condition # comparisons are provided in the tables below.

Draft PTO S-525-38-5	PTO S-525-38-3	Comments
1		Visible emissions from bin vent filter serving silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Y ATC Condition not on current PTO
2	2	
3	3	Draft PTO includes specific Rule 4202 requirements
4. Maximum total quantity of dry powder conveyed into Silo #6 (S-525-38) and Silo #7 (S-525-39) shall not exceed 192 tons/day. [District NSR Rule] Y	5. <del>Maximum quantity of dry powder conveyed into silo shall not exceed 180 tons/day. [District NSR Rule] Y</del>	Changes authorized by ATC
5	6	
6	1	
7. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070] Y		ATC condition not on PTO
8	4	
9. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Y		ATC condition not on PTO

Draft PTO S-525-39-8	PTO S-525-39-6	Comments
	1	Nuisance condition not included on draft PTO as it is on the facility wide PTO
1	2	
2	3	
3	4	
4. Maximum total quantity of dry powder conveyed into Silo #6 (S-525-38) and Silo #7 (S-525-39) shall not exceed 192 tons/day. [District NSR Rule] Y	7. <del>Throughput of silo shall not exceed 192 tons/day without prior District approval. [District Rule 2201] Y</del>	Changes authorized by ATC
5	8	
6	5	
7	9	
8	10	
9	11	

The following PTO condition was not included as it is redundant (with draft PTO S-525-39-8 condition #3):

6. Particulate matter emissions shall comply with District Rule 4202, section 4.0 (12/17/92). [District Rule 4202] Y

### S-525-47 and '-48

S-525-47 and '-48 are new permit units. The draft PTOs includes all the ATC conditions. Note that the ATCs erroneously did not include the following condition:

{1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Y

## **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. Current and Proposed Title V Operating Permits
- B. Authority to Construct Documents
- C. Application

**Attachment A**  
**Current and Proposed Title V Operating Permits**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-525-38-5

EXPIRATION DATE: 10/31/2015

**EQUIPMENT DESCRIPTION:**

50,000 GALLON DRY POWDER STORAGE SILO #6 SERVING DRYER #1 (S-525-36) WITH NUCON BIN VENT FILTER WITH 71.5 SQUARE FEET OF CLOTH AREA AND MAXIMUM FLOW OF 535 SCFM

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from bin vent filter serving silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Maximum total quantity of dry powder conveyed into Silo #6 (S-525-38) and Silo #7 (S-525-39) shall not exceed 192 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The owner/operator shall check for visible emissions weekly during silo loading. If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit
7. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070]
8. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-525-39-8

EXPIRATION DATE: 10/31/2015

**EQUIPMENT DESCRIPTION:**

57,000 GALLON POWDER STORAGE SILO WITH TWO NUCON BIN VENT FILTERS; RECEIVING POWDER ONLY FROM S-525-43 AND DISCHARGING ONLY TO BAGGING OPERATIONS S-525-30, '37, AND '44

## PERMIT UNIT REQUIREMENTS

1. Visible emissions from bin vent filter serving silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Maximum total quantity of dry powder conveyed into Silo #6 (S-525-38) and Silo #7 (S-525-39) shall not exceed 192 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The owner/operator shall check for visible emissions weekly during silo loading. If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit
7. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070]
8. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-525-47-1

EXPIRATION DATE: 10/31/2015

**EQUIPMENT DESCRIPTION:**

25,689 GALLON DRY POWDER STORAGE SILO PS11 WITH NUCON BIN VENT FILTER

DRAFT

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from bin vent filter serving silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Maximum total quantity of dry powder conveyed into Silo S-525-47 and Silo S-525-48 shall not exceed 180 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The owner/operator shall check for visible emissions weekly during silo loading. If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit
7. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070]
8. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] 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: S-525-48-1

EXPIRATION DATE: 10/31/2015

**EQUIPMENT DESCRIPTION:**

25,689 GALLON DRY POWDER STORAGE SILO PS12 WITH NUCON BIN VENT FILTER

DRAFT

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from bin vent filter serving silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Maximum total quantity of dry powder conveyed into Silo S-525-47 and Silo S-525-48 shall not exceed 180 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The owner/operator shall check for visible emissions weekly during silo loading. If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit
7. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070]
8. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] 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:** S-525-39-6

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

57,000 GALLON WHEY POWDER STORAGE SILO WITH TWO NUCON BIN VENT FILTERS; RECEIVING WHEY POWDER ONLY FROM S-525-43 AND DISCHARGING ONLY TO BAGGING OPERATIONS S-525-30, '-37, AND '-44

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Visible emissions from bin vent filter serving silo 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. The owner/operator shall check for visible emissions weekly during silo loading. If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall comply with District Rule 4202, section 4.0 (12/17/92). [District Rule 4202] Federally Enforceable Through Title V Permit
7. Throughput of silo shall not exceed 192 tons/day without prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
10. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-525-38-3

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

50,000 GALLON DRY POWDER STORAGE SILO #6 SERVING DRYER #1 (S-525-36) WITH NUCON BIN VENT FILTER WITH 71.5 SQUARE FEET OF CLOTH AREA AND MAXIMUM FLOW OF 535 SCFM

## PERMIT UNIT REQUIREMENTS

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1. The owner/operator shall check for visible emissions weekly during silo loading. If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.3.2] 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. Particulate matter emissions shall comply with District Rule 4202, section 4.0 (12/17/92). [District Rule 4202] Federally Enforceable Through Title V Permit
4. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. Maximum quantity of dry powder conveyed into silo shall not exceed 180 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM-10 emissions from bin vent filter shall not exceed 0.015 lb/ton of dry powder conveyed into silo. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall demonstrate compliance with silo throughput limit by maintaining a daily record of the quantity of dry powder conveyed into the silo. [District NSR Rule] Federally Enforceable Through Title V Permit

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

**Attachment B**  
**Authority to Construct Documents**



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-525-39-7

**ISSUANCE DATE:** 06/02/2011

**LEGAL OWNER OR OPERATOR:** LAND O' LAKES, INC.  
**MAILING ADDRESS:** 400 SOUTH M STREET  
TULARE, CA 93274

**LOCATION:** 400 SOUTH "M" ST  
TULARE, CA 93274

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 57,000 GALLON WHEY POWDER STORAGE SILO WITH TWO NUCON BIN VENT FILTERS; RECEIVING WHEY POWDER ONLY FROM S-525-43 AND DISCHARGING ONLY TO BAGGING OPERATIONS S-525-30, -37, AND -44. DELETE "WHEY" FROM EQUIPMENT DESCRIPTION, ADD COMBINED THROUGHPUT OF SILOS -38 AND -39 OF 192 TONS/DAY

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Visible emissions from bin vent filter serving silo 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. Maximum total quantity of dry powder conveyed into Silo #6 (S-525-38) and Silo #7 (S-525-39) shall not exceed 192 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

7. The owner/operator shall check for visible emissions weekly during silo loading . If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit
8. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-525-38-4

**ISSUANCE DATE:** 06/02/2011

**LEGAL OWNER OR OPERATOR:** LAND O' LAKES, INC.  
**MAILING ADDRESS:** 400 SOUTH M STREET  
TULARE, CA 93274

**LOCATION:** 400 SOUTH "M" ST  
TULARE, CA 93274

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 50,000 GALLON DRY POWDER STORAGE SILO #6 SERVING DRYER #1 (S-525-36) WITH NUCON BIN VENT FILTER WITH 71.5 SQUARE FEET OF CLOTH AREA AND MAXIMUM FLOW OF 535 SCFM: ADD COMBINED THROUGHPUT OF SILOS '-38 AND '-39 OF 192 TONS/DAY, DELETE "SERVING DRYER #1 (S-525-36)" FROM EQUIPMENT DESCRIPTION

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Visible emissions from bin vent filter serving silo 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. Maximum total quantity of dry powder conveyed into Silo #6 (S-525-38) and Silo #7 (S-525-39) shall not exceed 192 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

7. The owner/operator shall check for visible emissions weekly during silo loading . If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit
8. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-525-47-0

**ISSUANCE DATE:** 06/02/2011

**LEGAL OWNER OR OPERATOR:** LAND O' LAKES, INC.  
**MAILING ADDRESS:** 400 SOUTH M STREET  
TULARE, CA 93274

**LOCATION:** 400 SOUTH "M" ST  
TULARE, CA 93274

**EQUIPMENT DESCRIPTION:**  
25,689 GALLON DRY POWDER STORAGE SILO PS11 WITH NUCON BIN VENT FILTER

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Visible emissions from bin vent filter serving silo 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. Maximum total quantity of dry powder conveyed into Silo S-525-47 and Silo S-525-48 shall not exceed 180 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The owner/operator shall check for visible emissions weekly during silo loading. If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Saqredin, Executive Director / APCO

8. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-525-48-0

**ISSUANCE DATE:** 06/02/2011

**LEGAL OWNER OR OPERATOR:** LAND O' LAKES, INC.  
**MAILING ADDRESS:** 400 SOUTH M STREET  
TULARE, CA 93274

**LOCATION:** 400 SOUTH "M" ST  
TULARE, CA 93274

**EQUIPMENT DESCRIPTION:**  
25,689 GALLON DRY POWDER STORAGE SILO PS12 WITH NUCON BIN VENT FILTER

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Visible emissions from bin vent filter serving silo 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. Maximum total quantity of dry powder conveyed into Silo S-525-47 and Silo S-525-48 shall not exceed 180 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from silo shall not exceed 0.015 lb/ton dried powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The owner/operator shall check for visible emissions weekly during silo loading. If any particulate matter emissions are visible, the bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, and 2520 section 9.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

8. Daily records of throughput of silo shall be maintained, retained on-site and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Records of bin vent filter maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520; 9.4.2] Federally Enforceable Through Title V Permit
10. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

**Attachment C  
Application**

# San Joaquin Valley Air Pollution Control District

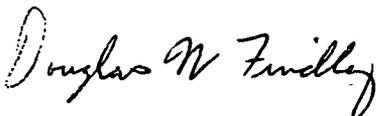
www.valleyair.org

**RECEIVED**  
**OCT 25 2011**

## Permit Application For:

**SJVAPCD**  
**Southern Region**

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>Land O' Lakes, Inc.</b>	
2. MAILING ADDRESS:	
STREET/P.O. BOX: <b>400 South M Street</b>	
CITY: <b>Tulare</b>	STATE: <b>CA</b>
	9-DIGIT <b>93274-</b> ZIP CODE: <b>5431</b>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	INSTALLATION DATE:
STREET: <b>400 South M Street</b>	<b>October 20, 2011</b>
CITY: <b>Tulare</b>	
_____ 1/4 SECTION    _____ TOWNSHIP    _____ RANGE	
4. GENERAL NATURE OF BUSINESS:	
<b>Milk Processing</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
<b>Minor modification to Title V Permit for Facility#S-525 to include following Authority To Construct: S-525-38-4, S-525-39-7, S-525-47-0, and S-525-48-0. Refer to attached cover letter and San Joaquin Valley Air Pollution Control District Project#S-1111324 for further details.</b>	
6. TYPE OR PRINT NAME OF APPLICANT:	TITLE OF APPLICANT:
<b>Douglas W Findley</b>	<b>Environmental Engineer</b>
7. SIGNATURE OF APPLICANT:	PHONE:    ( 559 ) 687-6653
	FAX:    ( 559 ) 685-6930
DATE: <b>Oct 20, 2011</b>	EMAIL: <a href="mailto:dwwfindley@landolakes.com">dwwfindley@landolakes.com</a>
	EMAIL: <b>m</b>

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED:    \$ _____	CHECK#:    _____
	DATE PAID:    _____	
	PROJECT NO: <b>S-1114380</b>	FACILITY ID: <b>S-525</b>

*Title V - Minor Mod*

RECEIVED  
OCT 25 2011  
SJVAPCD  
Southern Region

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: <b>Land O' Lakes, Inc.</b>	FACILITY ID: <b>S - 525</b>
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:	
3. Agent to the Owner:	

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:

  
\_\_\_\_\_  
Signature of Responsible Official

10/20/11  
\_\_\_\_\_  
Date

Stu Giffin   
\_\_\_\_\_  
Name of Responsible Official (please print)

Western Region Director of Manufacturing  
\_\_\_\_\_  
Title of Responsible Official (please print)