



SEP 26 2014

Mr. Michael Kummer
Hilmar Cheese Company
PO Box 910
Hilmar, CA 95324

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1275
Project # N-1130677**

Dear Mr. Kummer:

Enclosed is the District's analysis of your application for a 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 Permit N-1275-36-0 into the Title V operating permit. The modification was to install a 619 bhp diesel fired emergency engine.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority-to-Construct Permit N-1275-36-0, emission increases and the application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1130677

Engineer: Mark Schonhoff
Date: September 24, 2014

Facility Number: N-1275
Facility Name: Hilmar Cheese Company
Mailing Address: PO Box 910
Hilmar, CA 95324

Contact Name: Michael Kummer
Phone: (209) 656-1171

Responsible Official: Tedd Struckmeyer
Title: Vice President, Engineering & Business Development

I. PROPOSAL

Hilmar Cheese Company is proposing a Minor Modification to their Title V permit to incorporate Authority to Construct Permit (ATC) N-1275-36-0 into the current Title V permit. The ATC authorizes the installation of a 619 bhp diesel fired emergency engine. The ATC was issued without a Certificate of Conformity, therefore, a Title V modification was logged in under N-1275-36-1.

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

9001 North Lander Avenue
Hilmar, CA

III. EQUIPMENT DESCRIPTION

N-1275-36-0

619 BHP PERKINS MODEL 2206D-E13TAG3 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the 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

Hilmar Cheese Company received ATC N-1275-36-0, which authorizes the installation of a 619 bhp diesel fired emergency engine. Hilmar Cheese Company is now proposing to incorporate the ATC into the facility Title V 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. Draft Title V Operating Permit N-1275-36-1
- B. Authority to Construct Permit N-1275-36-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit
N-1275-36-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1275-36-1

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

619 BHP PERKINS MODEL 2206D-E13TAG3 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93115]
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]
7. The facility-wide NOx emissions shall not exceed 34,996 pounds during any rolling 12-month period. [District Rule 2201]
8. The facility-wide PM10 emissions shall not exceed 29,200 pounds during any rolling 12-month period. [District Rule 2201]
9. Emissions from this IC engine shall not exceed any of the following limits: 2.74 g-NOx/bhp-hr, 1.79 g-CO/bhp-hr, or 0.14 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
10. Emissions from this IC engine shall not exceed 0.107 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]
11. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
12. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
13. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 4701 and 4702 and 17 CCR 93115]
14. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rules 4701 and 4702]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rules 4701 and 4702]
16. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4701 and 4702 and 17 CCR 93115]
17. Records of the facility-wide NOx and PM10 emissions, on a rolling 12-month basis shall be kept. The records shall be updated at least monthly. [District Rule 2201]
18. The permittee shall maintain monthly records of the type of fuel purchased. [District Rules 4701 and 4702 and 17 CCR 93115]
19. 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 4701 and 4702 and 17 CCR 93115]

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

DRAFT

ATTACHMENT B

Authority to Construct Permit
N-1275-36-0



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1275-36-0

ISSUANCE DATE: 03/29/2013

LEGAL OWNER OR OPERATOR: HILMAR CHEESE COMPANY
MAILING ADDRESS: ATTN EHS COORDINATOR
P O BOX 910
HILMAR, CA 95324

LOCATION: 9001 N LANDER AVE
HILMAR, CA 95324

EQUIPMENT DESCRIPTION:
619 BHP PERKINS MODEL 2206D-E13TAG3 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING AN ELECTRICAL GENERATOR

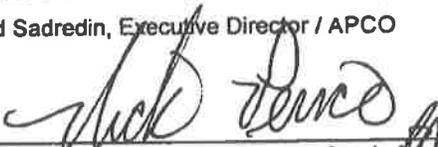
CONDITIONS

1. The permittee may construct or modify the equipment as authorized by this Authority to Construct at this time. Prior to operating with the modifications authorized by this Authority to Construct, the permittee shall submit to the District, an application for a Minor Permit Modification. [District Rule 2520, 5.3.2]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. 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]
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93115]
7. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]
8. The facility-wide NOx emissions shall not exceed 34,996 pounds during any rolling 12-month period. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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

N-1275-36-0; Mar 29 2013 11:28AM - SCHONNEM : Joint Inspection NOT Required

9. The facility-wide PM10 emissions shall not exceed 29,200 pounds during any rolling 12-month period. [District Rule 2201]
10. Emissions from this IC engine shall not exceed any of the following limits: 2.74 g-NOx/bhp-hr, 1.79 g-CO/bhp-hr, or 0.14 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
11. Emissions from this IC engine shall not exceed 0.107 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]
12. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
13. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
14. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 4701 and 4702 and 17 CCR 93115]
15. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rules 4701 and 4702]
16. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rules 4701 and 4702]
17. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4701 and 4702 and 17 CCR 93115]
18. Records of the facility-wide NOx and PM10 emissions, on a rolling 12-month basis shall be kept. The records shall be updated at least monthly. [District Rule 2201]
19. The permittee shall maintain monthly records of the type of fuel purchased. [District Rules 4701 and 4702 and 17 CCR 93115]
20. 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 4701 and 4702 and 17 CCR 93115]

ATTACHMENT C

Emissions Increases

ATC	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM ₁₀
N-1275-36-0	187	10	122	0	7
TOTAL	187	10	122	0	7

ATTACHMENT D

Application

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

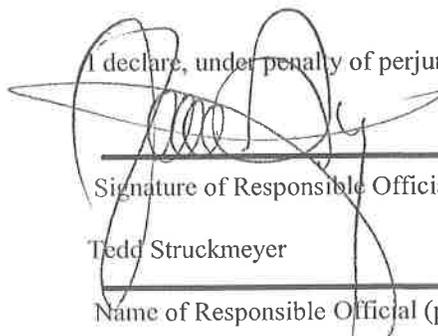
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Hilmar Cheese Company, Inc.	FACILITY ID: N - 1275
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: Hilmar Cheese Company, Inc.	
3. Agent to the Owner: Tedd Struckmeyer	

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

14 MARCH 2013

 Date

Tedd Struckmeyer

 Name of Responsible Official (please print)

Vice President, Engineering & Business Development

 Title of Responsible Official (please print)