



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 11 2013



HEALTHY AIR LIVING™

Mr. Daniel Lee
Paramount Farms Inc
13646 Highway 33
Losy Hills, CA 93249-9719

**Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # S-377
Project # 1130510**

Dear Mr. Lee:

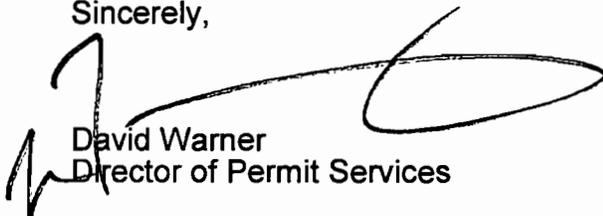
Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes installation of three (3) Incus 2.5 MMBtu/hr direct-fired dryers, removal of an existing 1.2 MMBtu/hr Proctor Schwartz Dryer, and revision of the permit equipment description to remove permit-exempt equipment.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authority to Construct with a Certificate of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

DW:RE/st

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email
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

Newspaper notice for publication in Bakersfield Californian and for posting on valleyair.org

**NOTICE OF PRELIMINARY DECISION
FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT AND
THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY
MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed significant modification of Paramount Farms Inc at 13646 Highway 33, Lost Hills, CA, California. The project authorizes installation of three (3) Incus 2.5 MMBtu/hr direct-fired dryers, removal of an existing 1.2 MMBtu/hr Proctor Schwartz Dryer, and revision of the permit equipment description to remove permit-exempt equipment. The project resulted in an increase in NO_x, SO_x, PM₁₀, CO, and VOC emissions of 614 lb/yr, 160 lb/yr, 158 lb/yr, 8,323 lb/yr, and 214 lb/yr, respectively.

The District's analysis of the legal and factual basis for this proposed action, project #1130510, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. This will be the public's only opportunity to comment on the specific conditions of the modification. If requested, the District will hold a public hearing regarding issuance of this modification. For additional information, please contact the District at (661) 392-5500. Written comments on the proposed initial permit must be submitted by October 16, 2013 to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**

Paramount Farms
S-377, 1130510

Rule 2520 Federally Mandated Operating Permits (6/21/01)

Rule 4101 Visible Emissions

Rule 4102 Nuisance

Rule 4201 Particulate Matter Concentration (12/17/92)

Rule 4309 Dryers, Dehydrators, and Ovens – **not applicable** - each dryer in permit unit S-377-40 is fired on natural gas and is rated at less than 5.0 MMBtu/hr

Rule 4801 Sulfur Compounds (12/17/92)

Section 41700 of the California Health & Safety Code

Section 42301.6 of the California Health & Safety Code

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA) CCR, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION:

The facility is located on Highway 33 approximately four miles north of Blackwell's Corner, California. The facility is not within 1,000 feet of a K-12 school.

Facility Location			
Stationary Source	Section	Township	Range
S-377	23	26S	19E

IV. PROCESS DESCRIPTION:

Pre-processed almonds are routed to the sliver/slicing, blanching, or flavoring lines by bin or conveyor. These nuts are passed through the flavoring equipment and then into a dryer where the free water is removed from the surface of the nut. Once dry, the flavored almonds are routed to the packaging line for delivery to the end user.

Proposed Modifications

Three (3) new Incus 2.5 MMBtu/hr direct-fired dryers will be installed. The existing 1.2 MMBtu/hr Proctor Schwartz Dryer #1 will be removed.

V. EQUIPMENT LISTING:

Pre-Project Equipment Description

S-377-40-10: MODIFICATION OF 9.84 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION INCLUDING: SORTING EQUIPMENT, MOISTURIZING LINE, PACKAGING EQUIPMENT, TWO BLANCHING LINES, BINS, TANKS, CONVEYORS, ELEVATORS AND ASSORTED HARDWARE, WITH ONE SLIVER SLICER LINE INCLUDING A PLASTICIZER WITH 32-10,000 BTU/HR BURNERS AND PROCTOR SCHWARTZ 1.2 MMBTU/HR DRYER (#1), AND ONE ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES- THE FIRST

WITH A 3-STAGE PROCTOR SCHWARTZ DRYER (#2) WITH TWO 1.6 MMBTU/HR NATURAL GAS FIRED BURNERS VENTED TO TWO CYCLONE ASSEMBLIES, SALT REMOVAL SHAKER, SURGE HOPPER, BUCKET ELEVATOR, AND ADDITIONAL CONVEYING EQUIPMENT- THE SECOND WITH AN AEROGLIDE MODEL C1120-65 RGC NATURAL GAS FIRED DRYER (#2) WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE, BIN DUMPERS, BRINE TANK, MIX TANKS, SLURRY KETTLES, SEASONING SKIDS, OSCILLATING FEEDERS AND ASSOCIATED CONVEYING EQUIPMENT: MOVE 4.0 MMBTU/HR AEROGLIDE NUT DRYER (#3) FROM S-377-47 AND ASSOCIATED FUEL USE LIMITS

Proposed Modification (with deleted exempt equipment in strikeout text):

S-377-40-11: MODIFICATION OF ~~9.84~~ 12.32 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION INCLUDING: ~~SORTING EQUIPMENT, MOISTURIZING LINE, PACKAGING EQUIPMENT, TWO BLANCHING LINES, BINS, TANKS, CONVEYORS, ELEVATORS AND ASSORTED HARDWARE, WITH ONE SLIVER SLICER LINE INCLUDING A PLASTICIZER WITH 32-10,000 BTU/HR BURNERS AND PROCTOR SCHWARTZ 1.2 MMBTU/HR DRYER (#1), AND ONE ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES THE FIRST WITH A 3-STAGE PROCTOR SCHWARTZ DRYER (#2) WITH TWO 1.6 MMBTU/HR NATURAL GAS FIRED BURNERS VENTED TO TWO CYCLONE ASSEMBLIES, SALT REMOVAL SHAKER, SURGE HOPPER, BUCKET ELEVATOR, AND ADDITIONAL CONVEYING EQUIPMENT THE SECOND WITH AN AEROGLIDE MODEL C1120-65 RGC NATURAL GAS FIRED DRYER (#2) WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE, BIN DUMPERS, BRINE TANK, MIX TANKS, SLURRY KETTLES, SEASONING SKIDS, OSCILLATING FEEDERS AND ASSOCIATED CONVEYING EQUIPMENT: MOVE 4.0 MMBTU/HR AEROGLIDE NUT DRYER (#3): REMOVE 1.2 MMBTU/HR PROCTOR DRYER #1, ADD 3 NEW 2.5 MMBTU/HR DIRECT FIRED DRYERS, REVISE EQUIPMENT DESCRIPTION TO REMOVE EXEMPT EQUIPMENT~~

Post Project Equipment Description:

S-377-40-11: 18.62 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING, FLAVORING AND PACKAGING OPERATION INCLUDING: A 0.32 MMBTU/HR PLASTICIZER (WITH 32 BURNERS), THREE INCUS 2.5 MMBTU/HR DIRECT-FIRED DRYERS, 3.6 MMBTU/HR PROCTOR SCHWARTZ DRYER #2 (WITH TWO BURNERS), ONE 3.6 MMBTU/HR AEROGLIDE NUT DRYER #2 (WITH TWO BURNERS) VENTED TO A CYCLONE, ONE 4.0 MMBTU/HR AEROGLIDE NUT DRYER #3 VENTED TO TWO CYCLONE ASSEMBLIES, AND ASSOCIATED PERMIT-EXEMPT EQUIPMENT.

VI. EMISSION CONTROL TECHNOLOGY EVALUATION:

The combustion equipment is fired on commercial natural gas. The small burners used in these units are thermostatically controlled to maintain drying chamber temperature usually in the 170°F to 230°F range. This relatively cool chamber temperature is achieved with a lower burner temperature, which inherently produces less NO_x than other types of dryers. Maxon has provided a written guarantee of NO_x at 0.011 lb-NO_x/MMBtu, or 9 ppmv, for Rule 4307 compliance.

Manufacturer's details on the burner are provided in **Attachment II**.

VII. CALCULATIONS:

A. Assumptions

- The almond finishing, flavoring and dehydration line is authorized to operate 24 hours/day and up to 365 days per year.
- The three Incus dryers will not exceed 56.31 MMScf/year combined fuel consumption.

B. Emission Factors

	NO _x	SO _x	PM10	CO	VOC
	lbm/MM scf	lbm/MM scf	lbm/MM scf	lbm/MM scf	lbm/MM scf
Plasticizer Burners	44.0	2.85	5.0	8.6	5.8
New Incus Dryers*	10.9	2.85	2.8	147.8	3.8
Proctors & Aeroglide #2	36.0	2.85	7.6	21.0	5.5
Aeroglide #3	83.2	2.85	2.8	21.0	3.8

*proposed

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Pre-Project Equipment Rating:

- 0.32 MMBtu/hr Plasticizer
- 1.2 MMBtu/hr Proctor #1
- 3.2 MMBtu/hr Proctor #2
- 3.6 MMBtu/hr Aeroglide #2
- 4.0 MMBtu/hr Aeroglide #3
- Total = 12.32 MMBtu/hr

The Pre-Project Potential to Emit (PE1) is calculated as follows:

Proctor #1, Proctor #2 and Aeroglide #2

0.1632 MMscf/day, 163.2 MMBtu/day, 6.8 MMBtu/hr, 37.15 MMscf/yr

37.15 billion Btu/yr

Pollutant	Daily Pre-Project Potential to Emit (PE1)			
	Emission Factors	Heat input	Hours per day	Daily PE1
NO _x	0.0360 (lb-NO _x /MMBtu)	x 6.8 (MMBtu/hr)	x 24 (hr/day)	= 5.9 (lb-NO _x /day)
SO _x	0.00285 (lb-SO _x /MMBtu)	x 6.8 (MMBtu/hr)	x 24 (hr/day)	= 0.5 (lb-SO _x /day)
PM ₁₀	0.0076 (lb-PM ₁₀ /MMBtu)	x 6.8 (MMBtu/hr)	x 24 (hr/day)	= 1.2 (lb-PM ₁₀ /day)
CO	0.0210 (lb-CO/MMBtu)	x 6.8 (MMBtu/hr)	x 24 (hr/day)	= 3.4 (lb-CO/day)
VOC	0.0055 (lb-VOC/MMBtu)	x 6.8 (MMBtu/hr)	x 24 (hr/day)	= 0.9 (lb-VOC/day)

Pollutant	Annual Pre-Project Potential to Emit (PE1)		
	Emission Factors	Annual Max Heat input	Annual PE1
NO _x	0.0360 (lb-NO _x /MMBtu)	x 37.15 (billion Btu/year)	= 1,337 (lb-NO _x /year)
SO _x	0.00285 (lb-SO _x /MMBtu)	x 37.15 (billion Btu/year)	= 106 (lb-SO _x /year)
PM ₁₀	0.0076 (lb-PM ₁₀ /MMBtu)	x 37.15 (billion Btu/year)	= 282 (lb-PM ₁₀ /year)
CO	0.0210 (lb-CO/MMBtu)	x 37.15 (billion Btu/year)	= 780 (lb-CO/year)
VOC	0.0055 (lb-VOC/MMBtu)	x 37.15 (billion Btu/year)	= 204 (lb-VOC/year)

Plasticizers

0.1035 MMscf/day, 103.5 MMBtu/day, 4.31 MMBtu/hr, 10 MMscf/yr, 10 billion Btu/yr

Pollutant	Daily Pre-Project Potential to Emit (PE1)			
	Emission Factors	Heat input	Hours per day	Daily PE1
NO _x	0.0440 (lb-NO _x /MMBtu)	x 4.31 (MMBtu/hr)	x 24 (hr/day)	= 4.6 (lb-NO _x /day)
SO _x	0.00285 (lb-SO _x /MMBtu)	x 4.31 (MMBtu/hr)	x 24 (hr/day)	= 0.3 (lb-SO _x /day)
PM ₁₀	0.0050 (lb-PM ₁₀ /MMBtu)	x 4.31 (MMBtu/hr)	x 24 (hr/day)	= 0.5 (lb-PM ₁₀ /day)
CO	0.0086 (lb-CO/MMBtu)	x 4.31 (MMBtu/hr)	x 24 (hr/day)	= 0.9 (lb-CO/day)
VOC	0.0058 (lb-VOC/MMBtu)	x 4.31 (MMBtu/hr)	x 24 (hr/day)	= 0.6 (lb-VOC/day)

Pollutant	Annual Pre-Project Potential to Emit (PE1)		
	Emission Factors	Annual Max Heat input	Annual PE1
NO _x	0.0440 (lb-NO _x /MMBtu)	x 10 (billion Btu/year)	= 440 (lb-NO _x /year)
SO _x	0.00285 (lb-SO _x /MMBtu)	x 10 (billion Btu/year)	= 29 (lb-SO _x /year)
PM ₁₀	0.0050 (lb-PM ₁₀ /MMBtu)	x 10 (billion Btu/year)	= 50 (lb-PM ₁₀ /year)
CO	0.0086 (lb-CO/MMBtu)	x 10 (billion Btu/year)	= 86 (lb-CO/year)
VOC	0.0058 (lb-VOC/MMBtu)	x 10 (billion Btu/year)	= 58 (lb-VOC/year)

Aeroglide #3

Nut Dryer (0.096 MMscf/day, 96 MMBtu/day, 4 MMBtu/hr, 30 MMscf/yr, 30 billion Btu/yr)

Pollutant	Daily Pre-Project Potential to Emit (PE1)			
	Emission Factors	Heat input	Hours per day	Daily PE1
NO _x	0.0832 (lb-NO _x /MMBtu)	x 4 (MMBtu/hr)	x 24 (hr/day)	= 8.0 (lb-NO _x /day)
SO _x	0.00285 (lb-SO _x /MMBtu)	x 4 (MMBtu/hr)	x 24 (hr/day)	= 0.3 (lb-SO _x /day)
PM ₁₀	0.0028 (lb-PM ₁₀ /MMBtu)	x 4 (MMBtu/hr)	x 24 (hr/day)	= 0.3 (lb-PM ₁₀ /day)
CO	0.0210 (lb-CO/MMBtu)	x 4 (MMBtu/hr)	x 24 (hr/day)	= 2.0 (lb-CO/day)
VOC	0.0038 (lb-VOC/MMBtu)	x 4 (MMBtu/hr)	x 24 (hr/day)	= 0.4 (lb-VOC/day)

Pollutant	Annual Pre-Project Potential to Emit (PE1)		
	Emission Factors	Annual Max Heat input	Annual PE1
NO _x	0.0832 (lb-NO _x /MMBtu)	x 30 (billion Btu/year)	= 2,496 (lb-NO _x /year)
SO _x	0.00285 (lb-SO _x /MMBtu)	x 30 (billion Btu/year)	= 86 (lb-SO _x /year)
PM ₁₀	0.0028 (lb-PM ₁₀ /MMBtu)	x 30 (billion Btu/year)	= 84 (lb-PM ₁₀ /year)
CO	0.0210 (lb-CO/MMBtu)	x 30 (billion Btu/year)	= 630 (lb-CO/year)
VOC	0.0038 (lb-VOC/MMBtu)	x 30 (billion Btu/year)	= 114 (lb-VOC/year)

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Pre Project Potential to Emit (PE1)		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO _x	5.9 + 4.6 + 8.0 = 18.5	1337 + 440 + 2496 = 4,273
SO _x	0.5 + 0.3 + 0.3 = 1.1	106 + 29 + 86 = 221
PM ₁₀	1.2 + 0.5 + 0.3 = 2.0	282 + 50 + 84 = 416
CO	3.4 + 0.9 + 2.0 = 6.3	780 + 86 + 630 = 1,496
VOC	0.9 + 0.6 + 0.4 = 1.9	204 + 58 + 114 = 376

Greenhouse Gas Emissions (neglecting all gases except CO₂)

$$37.15 + 10 + 30 = 77.15 \text{ BBtu/yr (77,150 MMBtu/yr)}$$

$$77,150 \text{ MMBtu/yr} \times 116.7 \text{ lb-CO}_2\text{e/MMBtu} \div 2,000 \text{ lb/ton}$$

$$= 4,502 \text{ tons-CO}_2\text{e/yr}$$

Post Project Potential to Emit (PE2)

Post-Project Equipment Rating:

0.32 MMBtu/hr Plasticizer

~~1.2 MMBtu/hr Proctor #1~~

7.5 MMBtu/hr Incus

3.2 MMBtu/hr Proctor #2

3.6 MMBtu/hr Aeroglide #2

4.0 MMBtu/hr Aeroglide #3

Total = 18.62 MMBtu/hr

The Post-Project Potential to Emit (PE2) is calculated as follows:

Incus Dryers (0.18 MMscf/day, 180 MMBtu/day, 7.5 MMBtu/hr, 56.31 MMscf/yr, 56.31 billion Btu/yr)

Pollutant	Daily Post-Project Potential to Emit (PE2)			
	Emission Factors	Heat input	Hours per day	Daily PE2
NO_x	0.0109 (lb-NO _x /MMBtu)	x 7.5 (MMBtu/hr)	x 24 (hr/day)	= 2.0 (lb-NO _x /day)
SO_x	0.00285 (lb-SO _x /MMBtu)	x 7.5 (MMBtu/hr)	x 24 (hr/day)	= 0.5 (lb-SO _x /day)
PM₁₀	0.0028 (lb-PM ₁₀ /MMBtu)	x 7.5 (MMBtu/hr)	x 24 (hr/day)	= 0.5 (lb-PM ₁₀ /day)
CO	0.1478 (lb-CO/MMBtu)	x 7.5 (MMBtu/hr)	x 24 (hr/day)	= 26.6 (lb-CO/day)
VOC	0.0038 (lb-VOC/MMBtu)	x 7.5 (MMBtu/hr)	x 24 (hr/day)	= 0.7 (lb-VOC/day)

Pollutant	Annual Post-Project Potential to Emit (PE2)		
	Emission Factors	Annual Max Heat input	Annual PE2
NO_x	0.0109 (lb-NO _x /MMBtu)	x 56.31 (billion Btu/year)	= 614 (lb-NO _x /year)
SO_x	0.00285 (lb-SO _x /MMBtu)	x 56.31 (billion Btu/year)	= 160 (lb-SO _x /year)
PM₁₀	0.0028 (lb-PM ₁₀ /MMBtu)	x 56.31 (billion Btu/year)	= 158 (lb-PM ₁₀ /year)
CO	0.1478 (lb-CO/MMBtu)	x 56.31 (billion Btu/year)	= 8,323 (lb-CO/year)
VOC	0.0038 (lb-VOC/MMBtu)	x 56.31 (billion Btu/year)	= 214 (lb-VOC/year)

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Post Project Potential to Emit (PE2)		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO _x	18.5 +2 = 20.5	4273 + 614 = 4,887
SO _x	1.1 +0.5 = 1.6	221 + 160 = 381
PM ₁₀	2.0 + 0.5 = 2.5	416 + 158 = 574
CO	6.3 + 26.6 = 32.9	1496 + 8323 = 9,819
VOC	1.9 + 0.7 = 2.6	376 + 214 = 590

Greenhouse Gas Emissions (neglecting all gases except CO₂)

$$77.15 + 56.31 = 133.46 \text{ BBtu/yr (133,460 MMBtu/yr)}$$

$$133,460 \text{ MMBtu/yr} \times 116.7 \text{ lb-CO}_2\text{e/MMBtu} \div 2,000 \text{ lb/ton}$$

$$= 7,787 \text{ tons-CO}_2\text{e/yr}$$

The emissions profiles are included in **Attachment III**.

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

Applicant has calculated SSPE1 which is listed below (**Attachment IV**).

SSPE1 (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	82,045	3,319	15,475	35,217	11,420

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

SSPE2 (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	82,045	3,319	15,475	35,217	11,420
S-377-40-11	4,887	381	574	9,819	590
S-377-40-10	-4,273	-221	-416	-1,496	-376
SSPE2	82,659	3,479	15,633	43,540	11,634

1. Major Source Determination

a. Rule 2201 Major Source Determination:

Pursuant to Section 3.23 of District Rule 2201, a major source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values.

Section 3.23.1 specifies, for determining major source status, fugitives shall only be included for calculating the air pollutant post-project emissions or SSPE2 if the source is included in the list of source categories identified in the major source definition in 40 CFR Part 70.2, or when determining if a stationary source is a major air toxics source as defined in Rule 2520.

Fugitive emissions from agricultural product column dryers are not included in the list of source categories identified in the major source definition of 40 CFR Part 70.2. Therefore, the SSPE2 for Major Source Determination purposes will exclude criteria pollutant combustion emissions from fugitive sources (i.e. pistachio column dryers). The following table summarizes the fugitive combustion emissions associated with each permit unit (Fugitive combustion PM₁₀ is assumed to also be PM_{2.5}):

Fugitive Emissions Excluded from Major Source Determination (lb/year)						
	NO _x	SO _x	PM ₁₀	PM _{2.5}	CO	VOC
S-377-3-25	25,376	869	763	763	6,405	1,159
S-377-19-29	18,720	641	563	563	4,725	855
Total	44,096	1,510	1,326	1,326	11,130	2,014

Section 3.23.2 specifies, for the purpose of determining major source status, SSPE2 shall not include the quantity of emission reduction credits (ERC) that have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. This ERC quantity includes all ERC held as certificates and all emission reduction credits that have been sold or transferred. PFI does not hold any ERC certificates for reductions that have occurred at the source.

Major Source Determination (lb/year)						
	NO _x	SO _x	PM ₁₀	PM _{2.5}	CO	VOC
Major Source SSPE1	37,949	1,808	14,150	14,150	24,087	9,406
Major Source SSPE2	38,123	1,940	14,258	32,324	23,797	9,562
Major Source Threshold	20,000	140,000	140,000	200,000	200,000	20,000
Major Source?	Yes	No	No	No	No	No

This source is an existing Major Source for NO_x emissions and will remain a Major Source for NO_x.

b. Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
	NO ₂	SO ₂	PM	PM ₁₀	CO	VOC	CO ₂ e
Estimated Facility PE before Project Increase	41.0	1.7	7.6	7.7	17.6	12.8	>100,000*
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y)	No	No	No	No	No	No	Yes

*applicant submitted emissions

As shown above, the facility is an existing major source for PSD for at least one pollutant. Therefore the facility is an existing major source for PSD.

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22

The facility is not a major source for SO_x, PM₁₀, CO, or VOC and therefore BE = PE1.

a. BE NO_x

As shown in Section VII.C.5 above, the facility is a major source for NO_x emissions.

Pursuant to Rule 2201, Section 3.12, a Clean Emissions Unit is defined as an emissions unit that is “equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

This emissions unit is equipped with a low NOX burner, which meets the requirements for achieved-in-practice BACT. Therefore, Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

Baseline Emissions Summary:

BE (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
S-377-40-10	4,273	220	416	1,496	376

7. SB 288 Major Modification

Since this facility is a major source for (NO_x), the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO _x	4,887	50,000	No
SO _x	Na	80,000	No
PM ₁₀	Na	30,000	No
VOC	Na	50,000	No

Na, not applicable as source is nonmajor for SO_x, PM₁₀, CO, and VOC

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201, Section 3.17 states that Federal Major Modifications are the same as “Major Modification” as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this facility is not a Major Source for SO_x, PM₁₀, CO, and VOCs, this project does not constitute a Federal Major Modification for these air contaminants. Additionally, since the facility is not a major source for PM₁₀ (140,000 lb/year), it is not a major source for PM_{2.5} (200,000 lb/year).

NO_x

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Since there is an increase in NO_x emissions by addition of a new combustion device, this project constitutes a Federal Major Modification, and no further analysis is required.

9. Rule 2410 Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀
- Greenhouse gases (GHG): CO₂, N₂O, CH₄, HFCs, PFCs, and SF₆

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

The facility is an existing PSD Major Source, the next step of the PSD evaluation is to determine if the project results in a PSD significant increase.

I. **Project Location Relative to Class 1 Area**

As demonstrated in the "PSD Major Source Determination" Section above, the facility was determined to be a existing major source for PSD. Two class I areas exist near the west side of Kern County. Pinnacles National Monument is approximately 140 kilometers to the north-northwest of, and San Rafael Wilderness is approximately 69 kilometers to the south-southwest of the facility. Because the project is not located within 10 km of a class 1 area, modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Significance of Project Emission Increase Determination

a. Potential to Emit of attainment/unclassified pollutant for New or Modified Emission Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if total potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)						
	NO ₂	SO _x	PM	PM ₁₀	CO	CO _{2e}
Total PE from New and Modified Units	2.4	0.2	0.3	0.3	4.9	7,787
PSD Significant Emission Increase Thresholds	40	40	25	15	100	75,000
PSD Significant Emission Increase?	No	No	No	No	No	No

As demonstrated above, because the project has a total potential to emit from all new and modified emission units below the PSD significant emission increase thresholds, this project is not subject to the requirements of Rule 2410 due to a significant emission increase and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC for each pollutant is shown in the table(s) below and reported in the PAS database emissions profile.

The QNEC shall be calculated as follows:

QNEC = (PE2 – BE)/4, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post Project Potential to Emit for each emissions unit, lb/yr.
- BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/yr.

QNEC (lb/qtr) — S-377-40-11					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	4,887	381	574	9,819	590
BE (lb/yr)	4,273	220	416	1,496	376
QNEC	154	40	40	2,081	54

VIII. COMPLIANCE:

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIFE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

The potential to emit for each new Incus dryer is summarized in the following table:

Device-Level Potential to Emit (lb/day)					
Device	NO _x	SO _x	PM ₁₀	CO	VOC
2.5 MMBtu Dryer	0.7	0.2	0.2	8.9	0.2

As seen above, the applicant is proposing to install new natural gas-fired dryers each with a PE greater than 2 lb/day for CO. BACT is not triggered for CO since the SSPE2 for CO is not greater than 200,000 lbs/year, as demonstrated in Section VII.C.5 of this document.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT, for relocation of emissions units with PE > 2 lb/day purposes, is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

As discussed in Section I above, there are no modified emissions units associated with this project; therefore BACT, for AIPE greater than 2.0 lb/day purposes, is not triggered.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.8 above, this project does constitute a Federal Major Modification for NO_x; therefore BACT, for major modification purposes, is triggered for NO_x.

2. BACT Guideline

BACT Guideline 1.6.9 applies to the almond processing dryer less than 10 MMBtu/hr heat input (See **Attachment V**).

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached Top-Down BACT Analysis (see **Attachment VI**), BACT has been satisfied with the following:

NO_x: low NO_x burner (stage combustion control)

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offset calculations will be required for this project.

Offset Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE2	82,659	3,479	15,633	43,540	11,634
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets calculations required?	Yes	No	No	No	No

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for NO_x, and the SSPE2 is greater than the offset thresholds; therefore offset calculations will be required for this project.

Per Sections 4.7.1 and 4.7.3, the quantity of offsets, in pounds per year, is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = $(\Sigma[\text{PE2} - \text{BE}] + \text{ICCE}) \times \text{DOR}$, for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE)

As calculated in Section VII.C.6 above, the Baseline Emissions (BE) from this unit are equal to the Pre-Project Potential to Emit (PE1) since the unit is a Clean Emissions Unit.

Also, there is only one emissions unit associated with this project and there are no increases in cargo carrier emissions; therefore offsets can be determined as follows:

NO _x Offsets Required (lb/year)					
Permit	PE2	BE	ICCE	DOR	
S-377-40-11	4,887	4,273			
			0	1.5	
NO_x Offsets Required =	$(\Sigma[4,887 - 4,273] + 0)$		$* 1.5 =$		921

Calculating the appropriate quarterly emissions to be reserved is as follows:

<u>1st Quarter</u>	<u>2nd Quarter</u>	<u>3rd Quarter</u>	<u>4th Quarter</u>
230	230	230	231

The applicant has stated that the facility plans to use an ERC certificate split from C-1225-2 to offset the increases in NO_x emissions associated with this project. The above quantizes are available and reserved for the project.

Proposed Rule 2201 (offset) Conditions:

- Prior to operating equipment under this Authority to Construct, permittee shall surrender NO_x emission reduction credits for the following quantity of emissions: 230 lb NO_x/Q1; 230 lb NO_x/Q2; 230 lb NO_x/Q3; and 231 lb NO_x/Q4. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 4/21/2011). [District Rule 2201]Y
- A certificate split from ERC Certificate Number C-1225-2 (or certificates split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Y

C. Public Notification

1. Applicability

Public noticing is required for:

- New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- Any modification that increases the SSPE1 above offset thresholds,
- Any New Stationary Source project with a SSPE2 which results in the offset thresholds being surpassed, and/or
- Any project with an SSPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Sections VII.C.7 and VII.C.8, this project is an SB 288 or Federal Major Modification. Therefore, public noticing for SB 288 or Federal Major Modification purposes is required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant; therefore public noticing for PE > 100 lb/day purposes is not required.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	82,045	82,659	20,000 lb/year	No
SO _x	3,319	3,479	54,750 lb/year	No
PM ₁₀	15,475	15,633	29,200 lb/year	No
CO	35,217	43,540	200,000 lb/year	No
VOC	11,420	11,634	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	82,659	82,045	614	20,000 lb/year	No
SO _x	3,479	3,319	160	20,000 lb/year	No
PM ₁₀	15,633	15,475	158	20,000 lb/year	No
CO	43,540	35,217	8,323	20,000 lb/year	No
VOC	11,634	11,420	214	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

Emissions from the Incus dryers shall not exceed any of the following limits: 10.9 lb-NOX/MMscf (as NO₂), 2.85 lb-SOX/MMscf (as SO₂), 2.8 lb-PM₁₀/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Y

Incus dryers natural gas usage shall not exceed 180,000 MMscf/day or 56.31 MMscf/yr. [District Rule 2201] Y

Emissions from the Proctor Schwartz #2 and Aeroglide #2 dryers shall not exceed any of the following limits: 36.0 lb-NOX/MMscf (as NO₂), 2.85 lb-SOX/MMscf (as SO₂), 7.6 lb-PM₁₀/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Y

Proctor Schwartz #2 and Aeroglide Dryer #2 natural gas usage shall not exceed 163,200 scf/day or 37.15 MMscf/year. [District Rule 2201] Y

Emissions from 4 MMBtu/hr Aeroglide #3 dryer shall not exceed any of the following limits: 83.2 lb-NOX/MMscf (as NO₂), 2.85 lb-SOX/MMscf (as SO₂), 2.8 lb-PM₁₀/MMscf, 21.0 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Y

Aeroglide # 3 natural gas usage shall not exceed 96,000 scf/day or 30 MMscf/yr. [District Rule 2201] Y

Emissions from the slicer and sliver lines (two plasticizers and two dryers) shall not exceed any of the following limits: 44.0 lb-NO_x/MMscf, 2.85 lb-SO_x/MMscf, 5.0 lb-PM₁₀/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District NSR Rule] Y

Slicer and sliver lines (two plasticizers and two dryers) natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District NSR Rule] Y

Three 2.5 MMBtu Incus dryers' combined natural gas usage shall not exceed 180,000 scf/day and 56.31 MMscf/year. [District Rule 2201] Y

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Record keeping

Record keeping is required to demonstrate compliance with the offset, public notification, and daily emission limit requirements of Rule 2201. The following conditions will appear on the permit to operate:

Records of daily and annual natural gas consumption shall be maintained. [District Rule 1070 and 2520, 9.4] Y

All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4] Y

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

An AAQA shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. The District's Technical Services Division conducted the required analysis. Refer to **Attachment VII** of this document for the AAQA summary sheet.

The proposed location is in an attainment area for NO_x, CO, and SO_x. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for NO_x, CO, or SO_x.

The proposed location is in a non-attainment area for the state's PM₁₀ as well as federal and state PM_{2.5} thresholds. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for PM₁₀ and PM_{2.5}.

G. Compliance Certification

Section 4.15.2 of this Rule requires the owner of a new Major Source or a source undergoing a Title I Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. As discussed in Section VIII above, this facility is a new major source and this project does constitute a Title I modification, therefore this requirement is applicable. PFI's compliance certification is included in **Attachment VIII**.

H. Alternate Siting Analysis

The current project occurs at an existing facility. The applicant proposes to install 3 2.5 MMBtu/hr Incus dryers.

Since the project will provide equipment to be used at the same location, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures on a much greater scale, and would therefore result in a much greater impact.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. Section 3.29 defines a significant permit modification as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

Section 3.20.5 states that a minor permit modification is a permit modification that does not meet the definition of modification as given in Section 111 or Section 112 of the Federal Clean Air Act. Since this project will result in a Federal Major Modification the proposed project is considered to be a modification under the Federal Clean Air Act. As a result, the proposed project constitutes a Significant Modification to the Title V Permit pursuant to Section 3.29.

As discussed in Section I, the facility has applied for a Certificate of Conformity (COC). Upon completion of the 45-day EPA review, the ATC will be issued with COC and will require a Title V administrative amendment application upon implementation. The facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications.

The Title V Compliance Certification form is included in **Attachment IX**.

Continued compliance with this rule is expected.

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). All particulate removal equipment handles particles greater than 10 microns and all combustion equipment burns PUC quality natural gas;

therefore visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility continued compliance is expected.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Attachment VII**), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
S-377-40-12	0.0079 per million	No

The project is approvable without TBACT.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot. As this equipment is all fired on PUC quality natural gas continued compliance with this rule is expected.

Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO₂, on a dry basis averaged over 15 consecutive minutes.

Paramount Farms
S-377, 1130510

The combustion equipment listed on these permits emit sulfur compounds and are limited to fire exclusively on PUC quality natural gas that will ensure compliance with this rule. Continued compliance is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school; therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Facility S-377 is subject to ARB's Cap and Trade regulation. Consistent with CCR §15064(h)(3), the District finds that compliance with ARB's Cap and Trade regulation would avoid or substantially lessen the impact of project-specific GHG emissions on global climate change. The District therefore concludes that projects occurring at facilities subject to ARB's Cap and Trade regulation would have a less than significant individual and cumulative impact on global climate change.

IX. Recommendation:

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATC S-377-40-11 subject to the permit conditions on the attached draft ATC in **Attachment X**.

X. Billing Information:

Filing fees have been submitted with this application. The annual permit fees will be based on the following schedules.

Permit Number	Fee Schedule	Fee Description	Annual Fee
S-377-40-11	3020-2-H	≥15 MM Btu/hr	\$ 1,030.00

Paramount Farms
S-377, 1130510

Attachments

- I. PTO S-377-40-9 and ATC S-377-40-10
- II. Manufacturer Details on Lox NOx Burner
- III. Emissions Profiles
- IV. SSPE
- V. BACT Guideline
- VI: BACT Analysis
- VII: HRA and AAQA Modeling
- VIII: Statewide Compliance Statement
- IX: Title V Compliance Certification form
- X: Draft ATCs

ATTACHMENT I
PTO S-377-40-9 and ATC S-377-40-10

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-377-40-9

EXPIRATION DATE: 10/31/2016

SECTION: NE23 TOWNSHIP: 26S RANGE: 19E

EQUIPMENT DESCRIPTION:

9.84 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION IN BUILDING #48 INCLUDING: SORTING EQUIPMENT, MOISTURIZING LINE, PACKAGING EQUIPMENT, TWO BLANCHING LINES, BINS, TANKS, CONVEYORS, ELEVATORS AND ASSORTED HARDWARE, WITH ONE SLIVER LINE AND ONE SLICER LINE EACH WITH A 32-10,000 BTU/HR BURNER PLASTICIZER AND ONE EACH 1.2 MMBTU/HR DRYER, AND ONE ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES - THE FIRST WITH A 3-STAGE PROCTOR SCHWARTZ ROASTER IN BUILDING #50 WITH TWO 1.6 MMBTU/HR NATURAL GAS FIRED BURNERS VENTED TO TWO CYCLONE ASSEMBLIES, SALT REMOVAL SHAKER, SURGE HOPPER, BUCKET ELEVATOR VENTED TO SOCK FILTERS AND ADDITIONAL CONVEYING EQUIPMENT - THE SECOND WITH AN AEROGlide MODEL C1 120-65 RGC NATURAL GAS FIRED ROASTER WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE, BIN DUMPERS, BRINE TANK, MIX TANKS, SLURRY KETTLES, SEASONING SKIDS, OSCILLATING FEEDERS 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 burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
3. Emissions from the slicer and sliver lines (two plasticizers and two dryers) shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 5.0 lb-PM10/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The slicer and sliver lines (two plasticizers and two dryers) natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the roasters shall not exceed any of the following limits: 36.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 7.6 lb-PM10/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The roasters' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
7. This almond finishing and packaging operation shall be equipped with two operational non-resettable totalizing fuel meters: one serving the slicer and sliver lines (two plasticizers and two dryers) and one serving the two roasters, to show compliance with the fuel usage limits set forth in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Records of daily and annual natural gas consumption shall be maintained. [District Rule 1070 and 2520, 9.4] Federally Enforceable Through Title V Permit
9. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4] Federally Enforceable Through Title V Permit

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

AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-40-10

ISSUANCE DATE: 10/18/2012

LEGAL OWNER OR OPERATOR: PARAMOUNT FARMS
MAILING ADDRESS: ATTN: DANIEL LEE
13646 HIGHWAY 33
LOST HILLS, CA 93249-9719

LOCATION: 3.5 MILES NORTH OF HWY 46 ON HWY 33
LOST HILLS, CA

SECTION: NE23 TOWNSHIP: 26S RANGE: 19E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 9.84 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION INCLUDING: SORTING EQUIPMENT, MOISTURIZING LINE, PACKAGING EQUIPMENT, TWO BLANCHING LINES, BINS, TANKS, CONVEYORS, ELEVATORS AND ASSORTED HARDWARE, WITH ONE SLIVER SLICER LINE INCLUDING A PLASTICIZER WITH 32-10,000 BTU/HR BURNERS AND PROCTOR SCHWARTZ 1.2 MMBTU/HR DRYER (#1), AND ONE ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES- THE FIRST WITH A 3-STAGE PROCTOR SCHWARTZ DRYER (#2) WITH TWO 1.6 MMBTU/HR NATURAL GAS FIRED BURNERS VENTED TO TWO CYCLONE ASSEMBLIES, SALT REMOVAL SHAKER, SURGE HOPPER, BUCKET ELEVATOR, AND ADDITIONAL CONVEYING EQUIPMENT- THE SECOND WITH AN AEROGLIDE MODEL C1120-65 RGC NATURAL GAS FIRED DRYER (#2) WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE, BIN DUMPERS, BRINE TANK, MIX TANKS, SLURRY KETTLES, SEASONING SKIDS, OSCILLATING FEEDERS AND ASSOCIATED CONVEYING EQUIPMENT: MOVE 4.0 MMBTU/HR AEROGLIDE NUT DRYER (#3) FROM S-377-47 AND ASSOCIATED FUEL USE LIMITS

CONDITIONS

1. 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] 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. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rule 4801] 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

DAVID WARNER, Director of Permit Services

S-377-40-10 : Aug 5 2013 2:07PM - EDGHEILR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

4. Emissions from the slicer and sliver lines (two plasticizers and two dryers) shall not exceed any of the following limits: 44.0 lb-NO_x/MMscf, 2.85 lb-SO_x/MMscf, 5.0 lb-PM₁₀/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The slicer and sliver lines (two plasticizers and two dryers) natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Emissions from the Proctor Schwartz and Aeroglide dryers shall not exceed any of the following limits: 36.0 lb-NO_x/MMscf, 2.85 lb-SO_x/MMscf, 7.6 lb-PM₁₀/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The Proctor Schwartz and Aeroglide dryers' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Emission rate per MMscf gas burned from the 4.0 MMBtu/hr Aeroglide nut dryer #3 shall not exceed any of the following: PM₁₀: 2.8 lb/MMscf, SO_x as (SO₂): 2.85 lb/MMscf, NO_x (as NO₂): 83.2 lb/MMscf, VOC: 3.8 lb/MMscf, or CO: 21.0 lb/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Natural gas combusted in the 4.0 MMBtu/hr Aeroglide nut dryer (#3) shall not exceed 0.096 MMscf/day nor 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This almond finishing and packaging operation shall be equipped with two operational non-resettable totalizing fuel meters: one serving the slicer and sliver lines (two plasticizers and two dryers) and one serving the two roasters, to show compliance with the fuel usage limits set forth in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Records of daily and annual natural gas consumption shall be maintained. [District Rule 1070 and 2520, 9.4] Federally Enforceable Through Title V Permit
12. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4] Federally Enforceable Through Title V Permit

ATTACHMENT II MANUFACTURER DETAILS ON LOW NO_x BURNER



COMBUSTION SYSTEMS FOR INDUSTRY

WWW.MAXONCORP.COM

May 7, 2013

Antonio Lopez-Ortiz
PARAMOUNT FARMS
13646 HWY 33
STAR ROUTE 399
LOST HILLS, CA 93249
USA

SUBJECT: MAXON M-PAKT ® BURNER EMISSIONS

REFERENCE: MAXON SALES PROPOSAL NO. 729764

We have received your request for an emissions guarantee and a completed Emissions Survey form. Maxon Corporation's M-PAKT ® Burner represents the finest in top quality combustion equipment. As such we can offer an amendment to our standard terms and conditions, which are attached for your reference.

For our Sales Order No. 0, Maxon will guarantee:

NOx emissions of 9 ppm corrected to 3% O₂.

CO emissions of 200 ppm corrected to 3% O₂.

The Guaranteed Emissions Turndown Ratio is from 0.625 MMBtu/hr through 2.5 MMBtu/hr

This is not a general guarantee for all products and installations. This guarantee is made only for the equipment, operating conditions and firing rates as stated on the Emissions Survey form and the following supplemental conditions below:

- Compliance testing must be completed within six (6) months from installation, or no later than twelve (12) months from shipment of the equipment from Seller (Maxon Corporation). Failure to test within this time frame constitutes full acceptance of the equipment.
- Maxon Corporation will guarantee, following a thorough engineering analysis of the application and process, and after acceptance by the customer of the total system being supplied by Maxon Corporation, that the stated equipment will meet or exceed the emissions requirement stated on the "Emissions Survey" form. Maxon Corporation will not be responsible for product or environmental influences on system emissions. The testing agency will be required to sample at a location in the process that accurately reflects specific burner performance.

Paramount Farms
May 7, 2013

The guarantee will be substantiated, at customer's expense, by an approved independent testing agency which has the required equipment capable of measuring emissions in the customer's specific application. The EPA methods found in 40CFR, Part 60, Appendix A shall be used for emissions measurement.

- NO_x USEPA Method 7E
- CO USEPA Method 10
- O₂ USEPA Method 3A
- CO₂ USEPA Method 3A
- VOC USEPA Method 25A

If independent testing indicates the emissions guarantee is not being met, Maxon Corporation reserves the right, at its expense, to modify, add or delete components of the system provided.

- Maxon Corporation personnel or their sub-contractor shall have adequate access to the combustion equipment sold for the purpose of adjustment.
- Maxon Corporation retains the right to secure the services of an independent firm specializing in emission measurement.
- After Maxon system modifications are approved, and adjustments completed, the customer again will contract the independent testing agency to verify emissions.
- If the equipment fails to meet the emission guarantee and is returned with prior authorization to Maxon within this specified period, Maxon Corporation will issue a credit to your account. This credit is limited to the value of the **M-PAKT** ® Burner(s), and bill of material as listed on Sales Proposal No.729764.
- Included in the credit will be the two emissions tests performed to substantiate this guarantee. Not included in the credit:
 1. Removal of or cost of prior equipment
 2. Installation of the equipment
 3. Re-installing or replacement equipment
 4. Loss of production
 5. Repairs to process equipment that may have been modified to suit this installation.

Page 3

Paramount Farms
May 7, 2013

- This guarantee is restricted to the original installation only. Any unauthorized alterations to the system or relocation of the equipment shall void this commitment.
- Once the guaranteed emission level has been attained, Maxon Corporation is no longer held by these supplemental conditions. The transaction reverts to Maxon standard terms and conditions – 73SA (enclosed).
- Maxon equipment must be installed and operated in accordance with Maxon catalog literature.
- This emissions performance guarantee requires Paramount Farms to use an “air/fuel” ratio control system as supplied by Maxon Corporation. Use of other air/fuel ratio control systems, limits this guarantee to one steady-state burner condition with the process in equilibrium.

We appreciate your continued interest in Maxon combustion equipment.

Sincerely,
Maxon Corporation

A handwritten signature in black ink that reads "Doug M Perry". The signature is written in a cursive, flowing style with a long horizontal line extending from the end of the name.

Doug Perry
Burner Engineering Manager

Enclosures (73SA) – Maxon Terms & Conditions



Emissions Survey

NOTE: Items labled in RED are required.

Submitted By: Stacy Mulrooney/maxoncorp
End User Name: Paramount Farms
End User Location: Lost Hills, CA

Date: 05/06/2013
Proposal #: 729764 SP
S.O. #: 0 SO
AB #: 108291
Project #:
Total \$:

OEM Name: N/A
OEM Location: N/A

Document Access:
Territory:

Current Status: Letter Completed
Publishing Flags: Publish in AED?

Burner

Burner Model: M-PAKT

Fuel: Natural Gas
Alt. Fuel:
Oxidant: Air

Burner Size:	Specified Maximum: (MMBTU/hr)	Firing Rate: (MMBTU/hr)
2.5	1.9	1.9

Emissions Turndown Required: 4 : 1 (ratio)

Supporting Fuel Analysis:

Application Parameters

Application: 0340 Continuous oven with air recirculation

Dwell time in chamber: Seconds

Temp Upstream: 180 ° F

Combustion Air Temp: 80 ° F

Temp Downstream: 220 ° F

Direction of Process Airflow: Perpendicular to Flame

O₂ % vol upstream: % Dry

Velocity Past Burner: sfp

O₂ % vol downstream: %

Pressure drop Across Airflow Burner: " w.c.

Other inerts in stream:

Chamber Pressure: " w.c. Constant

Chamber/Application Drawings:

Emission Requirements

Reason for Requirement: Must meet maximum emissions levels

Required Emissions:

NO_x 9

NO₂

CO 200

Other:(please specify)

Unit of Measurement
ppm corrected to 3% O₂

ppm corrected to 3% O₂

Response Thread

ATTACHMENT III Emissions Profiles

Permit #: S-377-40-11	Last Updated
Facility: PARAMOUNT FARMS	08/05/2013 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	4887.0	381.0	574.0	9819.0	590.0
Daily Emis. Limit (lb/Day)	2.5	1.6	2.5	32.9	2.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	153.0	40.0	39.0	2080.0	53.0
Q2:	153.0	40.0	39.0	2081.0	53.0
Q3:	154.0	40.0	40.0	2081.0	54.0
Q4:	154.0	41.0	40.0	2081.0	54.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio	1.5				
Quarterly Offset Amounts (lb/Qtr)					
Q1:	230.0				
Q2:	230.0				
Q3:	230.0				
Q4:	230.0				

ATTACHMENT IV SSPE Calculation

ATTACHMENT V BACT Guideline

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 1.6.9*

Last Update 10/30/1996

Dryer - Almond Processing, < 10 MMBtu/hr

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
NOx		Low NOx burner (utilizing stage combustion technology)	

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

ATTACHMENT VI BACT Analysis

Top Down BACT Analysis for NO_x Emissions from Almond Dryer

Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse guideline 1.6.9 identifies achieved in practice NO_x BACT for almond processing dryers as follows:

Low NO_x burner (utilizing staged combustion technology) (technologically feasible)

Step 2 - Eliminate Technologically Infeasible Options

The above technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

Low NO_x burner (utilizing staged combustion technology) (technologically feasible)

Step 4 - Cost Effectiveness Analysis

PFI is proposing the only control technology listed in step 3; a cost effectiveness analysis is not required.

Step 5 - Select BACT for NO_x

The applicant has proposed the installation of low NO_x burners meeting 9 ppm NO_x. Low NO_x burner (utilizing staged combustion technology) (technologically feasible)

ATTACHMENT VII HRA and AAQA Modeling

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Richard Edgehill – Permit Services
 From: Cheryl Lawler – Technical Services
 Date: August 6, 2013
 Facility Name: Paramount Farms LLC
 Location: 13646 Highway 33, Lost Hills
 Application #(s): S-377-40-12
 Project #: S-1130510

A. RMR SUMMARY

RMR Summary			
Categories	Natural Gas Dryers (Unit 40-12)	Project Totals	Facility Totals
Prioritization Score	0.00	0.00	>1
Acute Hazard Index	0.00	0.00	0.15
Chronic Hazard Index	0.00	0.00	0.57
Maximum Individual Cancer Risk	7.88E-09	7.88E-09	4.56E-07
T-BACT Required?	No		
Special Permit Conditions?	Yes		

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Unit 40-12

- {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] N

B. RMR REPORT

I. Project Description

Technical Services received a request on August 5, 2013, to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for three new 2.5 MMBtu/hr natural gas dryers. An existing 1.2 MMBtu/hr dryer will be removed.

II. Analysis

For the Risk Management Review, toxic emissions from the dryers were calculated using 2001 Ventura County Air Pollution Control District emission factors for natural gas fired external combustion. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905-1, March 2, 2001), risks from the proposed project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEART's database. The prioritization score was less than 1.0 (see RMR Summary Table); however, the facility's combined prioritization scores totaled to greater than one. Therefore, a refined Health Risk Assessment was required and performed for the project. AERMOD was used with point source parameters outlined below and concatenated 5-year meteorological data from Bakersfield to determine maximum dispersion factors at the nearest residential and business receptors. The dispersion factors were input into the HARP model to calculate the Chronic and Acute Hazard Indices and the Carcinogenic Risk for the project.

The following parameters were used for the review:

Analysis Parameters			
Source Type	Point	Closest Receptor (m)	1859
Stack Height (m)	6.1	Closest Receptor Type	Residence
Stack Diameter (m)	0.61	Project Location Type	Rural
Stack Gas Temperature (K)	322	Natural Gas Rates (mmscf)	0.0075 hr 56.3 yr
Stack Gas Velocity (m/s)	32.34		

Technical Services also performed modeling for criteria pollutants CO, NO_x, SO_x, PM₁₀, and PM_{2.5}, as well as the RMR. Emission rates used for criteria pollutant modeling were 32.9 lb/day CO, 20.5 lb/day NO_x, 1.6 lb/day SO_x, 2.5 lb/day PM₁₀, and 2.5 lb/day PM_{2.5}.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*

Values are in $\mu\text{g}/\text{m}^3$

Natural Gas Dryers	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	Pass	X	Pass	X	X
NO _x	Pass ²	X	X	X	Pass
SO _x	Pass	Pass	X	Pass	Pass
PM ₁₀	X	X	X	Pass ¹	Pass ¹
PM _{2.5}	X	X	X	Pass ³	Pass ³

*Results were taken from the attached PSD spreadsheet.

¹The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

²The project was compared to the 1-hour NO₂ National Ambient Air Quality Standard that became effective on April 12, 2010, using the District's approved procedures.

³For this case as per District procedure, minor PM_{2.5} sources are modeled only for primary PM_{2.5} concentrations, and these concentrations are compared to the 24-hour SIL of 1.2 $\mu\text{g}/\text{m}^3$ and the annual SIL of 0.3 $\mu\text{g}/\text{m}^3$.

III. Conclusions

The criteria modeling runs indicate the emissions from the proposed equipment will not cause or significantly contribute to a violation of a State or National AAQS.

The acute and chronic indices are below 1.0; and the maximum individual cancer risk associated with the project is **7.88E-09**, which is less than the 1 in a million threshold. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on Page 1 of this report must be included for the proposed project.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Attachments:

RMR Request Form
Prioritization
Refined Modeling Results
AAQA Results
Facility Summary

ATTACHMENT VIII

Statewide Compliance Statement

CERTIFICATION

Paramount Farms, LLC hereby certifies as follows:

1. Paramount Farms owns or operates certain major stationary sources in the State of California. Such sources are comprised of a vast number of emission points. As used in this certification, the term "major stationary source" shall, with respect to Paramount Farms stationary sources in the SJVUAPCD, have the meaning ascribed thereto in SJVUAPCD Rule 2201, Section 3.23, and shall, with respect to all of Paramount's other stationary sources in the State of California, have the meaning ascribed thereto in section 302(J) of the Clean Air Act (42 U.S.C. Section 7602 (J)).

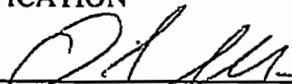
2. Subject to paragraphs 3 and 4 below, all major stationary sources owned or operated by Paramount Farms in the State of California are either in compliance, or on an approved schedule of compliance, with all applicable emission limitations and standards under the Clean Air Act and all of the State Implementation Plan approved by the Environmental Protection Agency.

3. This certification is made on information and belief and is based upon a review of Paramount Farms major stationary sources in the State of California by those employees of Paramount Farms who have operational responsibility for compliance. In conducting such reviews, Paramount Farms and its employees have acted in good faith and have exercised best efforts to identify any exceedance of the emission limitations and standards referred to in paragraph 2 thereof.

4. This certification shall speak as of the time and date of its execution.

CERTIFICATION

By:



Dave Szefflin

Title: Vice President of Operations

Date:

4/16/2013

ATTACHMENT IX

Title V Compliance Certification form

**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 AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: Paramount Farms, Inc.	FACILITY ID: S-377
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

4/26/2013
Date

Dave Szefflin

Name of Responsible Official (please print)

Vice President of Operations

Title of Responsible Official (please print)

ATTACHMENT X

Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-377-40-11

LEGAL OWNER OR OPERATOR: PARAMOUNT FARMS
MAILING ADDRESS: ATTN: DANIEL LEE
13646 HIGHWAY 33
LOST HILLS, CA 93249-9719

LOCATION: 3.5 MILES NORTH OF HWY 46 ON HWY 33
LOST HILLS, CA

SECTION: NE23 TOWNSHIP: 26S RANGE: 19E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 9.84 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION IN BUILDING #48 INCLUDING: SORTING EQUIPMENT, MOISTURIZING LINE, PACKAGING EQUIPMENT, TWO BLANCHING LINES, BINS, TANKS, CONVEYORS, ELEVATORS AND ASSORTED HARDWARE, WITH ONE SLIVER LINE AND ONE SLICER LINE EACH WITH A 32-10,000 BTU/HR BURNER PLASTICIZER AND ONE EACH 1.2 MMBTU/HR DRYER, AND ONE ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES - THE FIRST WITH A 3-STAGE PROCTOR SCHWARTZ ROASTER IN BUILDING #50 WITH TWO 1.6 MMBTU/HR NATURAL GAS FIRED BURNERS VENTED TO TWO CYCLONE ASSEMBLIES, SALT REMOVAL SHAKER, SURGE HOPPER, BUCKET ELEVATOR VENTED TO SOCK FILTERS AND ADDITIONAL CONVEYING EQUIPMENT - THE SECOND WITH AN AEROGlide MODEL C1 120-65 RGC NATURAL GAS FIRED ROASTER WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE, BIN DUMPERS, BRINE TANK, MIX TANKS, SLURRY KETTLES, SEASONING SKIDS, OSCILLATING FEEDERS AND ASSOCIATED CONVEYING EQUIPMENT: REMOVE 1.2 MMBTU/HR PROCTOR DRYER #1, ADD 3 NEW 2.5 MMBTU/HR DIRECT FIRED DRYERS, REVISE EQUIPMENT DESCRIPTION TO REMOVE EXEMPT EQUIPMENT

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] 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.

Sayed Sadredin, Executive Director APCO

DRAFT

DAVID WARNER, Director of Permit Services

S-377-40-11: Sep 9 2013 4:56PM - EDGEHILL : Joint Inspection NOT Required

3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Almond finishing and packaging operation shall be equipped with two operational non-resettable totalizing fuel meters: one serving the slicer and sliver lines (two plasticizers and two dryers) and one serving the two roasters, to show compliance with the fuel usage limits set forth in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Combustion equipment shall be equipped with operational non-resettable, totalizing fuel meters to demonstrate compliance with fuel consumption limits. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
7. Emissions from the Incus dryers shall not exceed any of the following limits: 10.9 lb-NOX/MMscf (as NO₂), 2.85 lb-SOX/MMscf (as SO₂), 2.8 lb-PM₁₀/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from the Proctor Schwartz #2 and Aeroglidge #2 dryers shall not exceed any of the following limits: 36.0 lb-NOX/MMscf (as NO₂), 2.85 lb-SOX/MMscf (as SO₂), 7.6 lb-PM₁₀/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Proctor Schwartz #2 and Aeroglidge Dryer #2 natural gas usage shall not exceed 163,200 scf/day or 37.15 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from 4 MMBtu/hr Aeroglidge #3 dryer shall not exceed any of the following limits: 83.2 lb-NOX/MMscf (as NO₂), 2.85 lb-SOX/MMscf (as SO₂), 2.8 lb-PM₁₀/MMscf, 21.0 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Aeroglidge # 3 natural gas usage shall not exceed 96,000 scf/day or 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions from the slicer and sliver lines (two plasticizers and two dryers) shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 5.0 lb-PM₁₀/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Slicer and sliver lines (two plasticizers and two dryers) natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Three 2.5 MMBtu Incus dryers' combined natural gas usage shall not exceed 180,000 scf/day and 56.31 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of daily and annual natural gas consumption shall be maintained. [District Rule 1070 and 2520, 9.4] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4] Federally Enforceable Through Title V Permit
17. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOX emission reduction credits for the following quantity of emissions: 230 lb NOx/Q1; 230 lb NOx/Q2; 230 lb NOx/Q3; and 231 lb NOx/Q4. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 4/21/2011). [District Rule 2201] Federally Enforceable Through Title V Permit
18. A certificate split from ERC Certificate Number C-1225-2 (or certificates split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

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