



OCT 25 2013

Mr. Daniel Lee
Paramount Farms, Inc.
13646 Highway 33
Lost Hills, CA 93249

Re: Notice of Minor Title V Permit Modification
District Facility # S-377
Project # 1124172

Dear Mr. Lee:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATC S-377-54-0 into the Title V operating permit. The permit is for an emergency firewater pump IC engine.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC S-377-54-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

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 #: S-1124172

Engineer: David Torii
Reviewing Engineer: Rich Karrs

Facility Number: S-377
Facility Name: Paramount Farms, Inc.
Mailing Address: 13646 Highway 33
Lost Hills, CA 93249

Contact Name: Daniel Lee
Phone: 661-797-6505

Responsible Official: Dave Szefflin
Title: Vice President of Operations

I. PROPOSAL

Paramount Farms, Inc. is proposing a Title V minor permit modification to add an emergency firewater pump IC engine their Title V operating permit.

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

II. FACILITY LOCATION

The facility is located at 950 Petroleum Club Road in Taft.

III. EQUIPMENT DESCRIPTION

Proposed ATC:

S-377-54-0: 305 BHP JOHN DEERE MODEL JU6H-UFADX8 TIER 3
CERTIFIED DIESEL-FIRED EMERGENCY STANDBY
IC ENGINE POWERING A FIREWATER PUMP

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Changes in the original Permit to Operate and the implemented ATC are as follows

Proposed PTO S-377-51-1	
New conditions on proposed PTO S-377-54-1	Explanation
1-11	New Equipment/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.

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(S-377-54-1)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-377-54-1

EXPIRATION DATE: 10/31/2016

EQUIPMENT DESCRIPTION:

305 BHP JOHN DEERE MODEL JU6H-UFADX8 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIREWATER PUMP

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. {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]
4. {3395} 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]
5. {3403} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115]
6. Emissions from this IC engine shall not exceed any of the following limits: 2.7 g-NOx/bhp-hr, 0.4 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
7. Emissions from this IC engine shall not exceed 0.06 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
8. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
9. {3807} 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 Rule 4702]
10. {3489} 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, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). 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 Rule 4702 and 17 CCR 93115]
11. {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

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

Facility Name: PARAMOUNT FARMS

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

S-377-54-1: Oct 22 2013 2:26PM -- TORID

ATTACHMENT B

ATC

(S-377-54-0)



AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-54-0

ISSUANCE DATE: 11/05/2012

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

EQUIPMENT DESCRIPTION:
305 BHP JOHN DEERE MODEL JU6H-UFADX8 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIREWATER PUMP

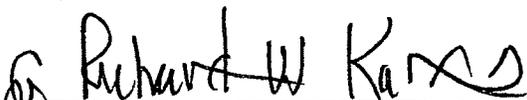
CONDITIONS

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. 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. 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. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115]
8. Emissions from this IC engine shall not exceed any of the following limits: 2.7 g-NOx/bhp-hr, 0.4 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]

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-377-54-0; Nov 5 2012 2:05PM - TORID : Joint Inspection NOT Required

9. Emissions from this IC engine shall not exceed 0.06 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
10. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
11. 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 Rule 4702]
12. 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, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). 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 Rule 4702 and 17 CCR 93115]
13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]
14. Permits S-377-38 and '53 shall be canceled upon implementation of this ATC. [District Rule 2201]

ATTACHMENT C

Emission Increase

SSIPE (lb/yr)				
NOx	VOC	CO	SOx	PM10
182	7	27	0	4

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

NOV 13 2012

SJVAPCD
Southern Region

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>Paramount Farms, Inc.</u>	
2. MAILING ADDRESS:	
STREET/P.O. BOX: <u>13646 Highway 33</u>	
CITY: <u>Lost Hills</u>	STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93249</u>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	
STREET: <u>13646 Highway 33</u> CITY: <u>Lost Hills</u>	
<u>NE</u> ¼ SECTION <u>23</u> TOWNSHIP <u>26S</u> RANGE <u>19E</u>	INSTALLATION DATE: <u>11/2012</u>
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">Nut Processing</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
S-377-54-0: 305 BHP JOHN DEERE MODEL JU6H-UFADX8 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIREWATER PUMP	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Daniel Lee</u>	TITLE OF APPLICANT: <u>Technical Services Manager</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>11/13/2012</u>
	PHONE: (661) 797-6505 FAX: (661) 797-6542 EMAIL: <u>dlee@paramountfarms.com</u>

For APCD Use Only: NO \$

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>S-1124172</u> FACILITY ID: <u>S-377</u>

*Minor
mael*

NOV 13 2012

SJVAPCD
Southern Region

5500 Ming Avenue
Suite 360
Bakersfield, CA 93309-4693

Tel (661) 282-2200
Fax (661) 282-2204
insight@insenv.com

November 12, 2012

Mr. Dave Warner
Director Permit Services
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

**re: Application to Modify Title V Permit
District Facility No. S-377**

Dear Mr. Warner:

On behalf of Paramount Farms Inc. (PFI) please find attached an application form and compliance certification form for a Title V modification of PFI's federal operating permit. The facility is in the process of implementing Authority to Construct number S-377-54-0 authorizing the installation of a 305 bhp engine powering a firewater pump. Unit S-377-54-0 will be a permanent replacement for units S-377-38 and '-53.

If you have any questions regarding this request, please do not hesitate to call Daniel Lee of PFI at (661) 797-6505 or myself at (661) 282-2200.

Sincerely,



Douglas W. McCormick, P.E.
Principal

cc: Daniel Lee, PFI

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

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



Signature of Responsible Official

10/15/2012

Date

Dave Szeflin

Name of Responsible Official (please print)

Vice President of Operations

Title of Responsible Official (please print)

New 305 hp Clarke Engine Powering a Firewater Pump



AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-54-0

ISSUANCE DATE: 11/05/2012

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

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Sayed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

S-377-54-0: Nov 5 2012 2:05PM - TORID : Joint Inspection NOT Required

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