



MAR 18 2015

Mr. David Bryson
Rainbow Farms
P O Box 910
Turloch, CA 95316

Re: Notice of Minor Title V Permit Modification
District Facility # N-5526
Project # N-1150713

Dear Mr. Bryson:

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 N-5526-22-0 (under project N-1084152) into the Title V operating permit. The ATC was for an 871 bhp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-5526-22-0, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1150713

Engineer: Tim Bush
Date: March 10, 2015

Facility Number: N-5526
Facility Name: Rainbow Farms
Mailing Address: P O Box 910
Turloch, CA 95316

Contact Name: David Bryson
Phone: (209) 669-5500

Responsible Official: David Bryson
Title: Manager

I. PROPOSAL

Rainbow Farms is proposing a Title V minor permit modification to incorporate ATC N5526-22-0 (under project N-1084152) into the Title V operating permit. Rainbow Farms applied for an Authority to Construct (ATC) to reevaluate permit N-5526-5-0, a 147 bhp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator.

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

1220 Hall Rd
Denair, CA

III. EQUIPMENT DESCRIPTION

N-5526-22-0: 871 BHP DAEWOO MODEL P222LE TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR (FORMERLY N-5526-5-0)

IV. SCOPE OF EPA AND PUBLIC REVIEW

ATC N-5526-22-0 was issued under the 12/18/08 NSR Rule that had major modification thresholds of 50,000 pounds for NO_x and 50,000 pounds for VOC.

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

Rainbow Farms proposes to reevaluate permit N-5526-5-0, a 147 bhp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator. During the inspection for the inhouse Permits to Operate (PTO) it was observed that the engine installed and permit equipment description did not match. The inspector instructed the facility to submit an application to correct the equipment description. A comparison between the engine inspection report and initial application submitted shows that the serial numbers are the same. The initial application listed the installation date as occurring prior to January 1, 2004, the date that agricultural operations lost their exemption status. However, the engine was installed after the date the exemption was lost (March 2004) as indicated by the current application. Because an inhouse permit could not have been issued to equipment that required an ATC at the time of installation, PTO N-5526-5-0 was cancelled. Therefore this engine was reevaluated and underwent New Source Review.

N-5526-22-1:

Conditions 1 through 16 from the ATC are listed as conditions 1 through 16 on the proposed PTO.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;

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

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

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

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. N-5526-22-1
- B. Authorities to Construct No. N-5526-22-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(N-5526-22-1)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-5526-22-1

EXPIRATION DATE: 12/31/2017

EQUIPMENT DESCRIPTION:

871 BHP DAEWOO MODEL P222LE TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING AN ELECTRICAL GENERATOR (FORMERLY N-5526-5-0)

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. 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] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed any of the following limits: 6.12 g-NOx/bhp-hr, 0.70 g-CO/bhp-hr, or 0.03 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
8. Emissions from this IC engine shall not exceed 0.07 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
10. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
12. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
14. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
15. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
16. 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] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authorities to Construct No.
(N-5526-22-0)



AUTHORITY TO CONSTRUCT

PERMIT NO: N-5526-22-0

ISSUANCE DATE: 12/15/2010

LEGAL OWNER OR OPERATOR: RAINBOW FARMS
MAILING ADDRESS: PO BOX 910
TURLOCK, CA 95381

LOCATION: 1220 HALL RD
DENAIR, CA 95316

EQUIPMENT DESCRIPTION:

871 BHP DAEWOO MODEL P222LE TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING AN ELECTRICAL GENERATOR (FORMERLY N-5526-5-0)

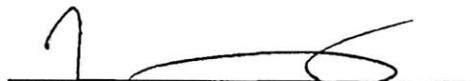
CONDITIONS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. 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]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart III]
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart III]
7. Emissions from this IC engine shall not exceed any of the following limits: 6.12 g-NOx/bhp-hr, 0.70 g-CO/bhp-hr, or 0.03 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart III]
8. Emissions from this IC engine shall not exceed 0.07 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart III]
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 60 Subpart III]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
N-5526-22-0 : Dec 15 2010 9:34AM - THAOC : Joint Inspection NOT Required

10. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
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. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
13. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702]
14. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII]
15. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
16. 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]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-5526-22-1	587	3	67	0	7
TOTAL	587	3	67	0	7

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
MAR 02 2015
HEALTHY AIR LIVING

Permits Services
SJVAPCD

Permit Application For:

[] ADMINISTRATIVE AMENDMENT MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>Rainbow Farms</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>PO Box 910</u> CITY: <u>Turlock</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95316</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>1220 Hall Rd</u> CITY: <u>Denair</u> 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <u>4-15-04</u>
4. GENERAL NATURE OF BUSINESS: <u>Egg Production</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>871 BHP Deere model P222LE Tier 1 - Generator</u> <u>N-5526-22-0</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>David Bryson</u>	TITLE OF APPLICANT: <u>Mgr</u>
7. SIGNATURE OF APPLICANT: <u>David Bryson</u>	DATE: <u>2-25-15</u> PHONE: <u>(209) 669-5500</u> FAX: <u>()</u> EMAIL: <u>dbryson@usfz.com</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ <u>19.00</u> CHECK#: <u>376142</u>
	DATE PAID: <u>3-2-2015</u>
	PROJECT NO: <u>N-1150713</u> FACILITY ID: <u>N-5526</u>

Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061



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: <u>Rainbow Farms</u>	FACILITY ID: <u>N-5526</u>
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: <u>Valley Fresh Foods Inc.</u>	
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:

David Bryson
Signature of Responsible Official

2-25-15
Date

David Bryson
Name of Responsible Official (please print)

Mgr.
Title of Responsible Official (please print)