



January 30, 2015

Mr. Kevin Rebelo
Morning Star Packing Company
13448 South Volta Road
Los Banos, CA 93635

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1326
Project # N-1150013**

Dear Mr. Rebelo:

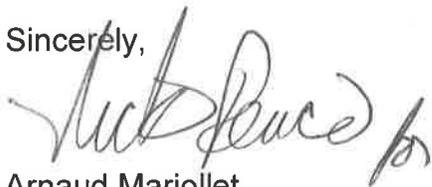
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-1326-15-0 into the Title V operating permit. The project was to install a 96 bhp natural gas fired emergency standby IC engine powering an electrical generator.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1326-15-0, emission increases, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1150013

Engineer: Nick Peirce
Date: January 29, 2015

Facility Number: N-1326
Facility Name: Morning Star Packing Company
Mailing Address: 13448 South Volta Road
Los Banos, CA 93635

Contact Name: Kevin Rebelo
Phone: (209) 827-7854

Responsible Official: Kevin Rebelo
Title: Steam Generating Colleague

I. PROPOSAL

Morning Star Packing Company is proposing a Minor Modification to its Title V permit to incorporate Authority to Construct (ATC) N-1326-15-0. The change authorized by the ATC is:

N-1326-15-0: Install a 96 bhp natural gas fired emergency standby 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

This facility is located at 13448 S. Volta Road, Los Banos, California.

III. EQUIPMENT DESCRIPTION

N-1326-15-1:

96 BHP GENERAC MODEL 6.8GN NATURAL GAS-FIRED EMERGENCY
STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

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

Morning Star Packing Company received Authority to Construct N-1326-15-0, which authorized the installation of a 96 bhp natural gas fired emergency engine powering an electrical generator. Morning Star Packing Company is now proposing to incorporate that Authority to Construct into the facility Title V permit.

This section details the description of the modifications to the permit conditions.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Since the requirements of 40 CFR Part 60 Subpart JJJJ shall be enforced by the TV permit, as such, a detailed analysis of this subpart is necessary to ensure compliance with all the applicable requirements of the subpart.

Applicability:

Section 60.4230(a)(4)(iv) states that the provisions of this subpart apply to owners and operators of stationary spark ignition (SI) internal combustion engines that commence construction after January 1, 2009 for emergency engines with a maximum engine power greater than 25 hp. The engine in this project was manufactured after 2009 and is greater than 25 hp. Therefore, this subpart applies to the proposed engine.

Emission Standards For Owners and Operators:

Section 60.4233(d) states that owners and operators of stationary SI ICE with a maximum power greater than 25 bhp and less than 100 bhp must comply with the emission standards in Table 1 to this subpart for the emergency stationary SI ICE. This engine is a rich burn engine, greater than 25 bhp, and an emergency engine; therefore, this engine is subject to the emission standards of this section.

	NOx (g/hp-hr) + VOC (gr/hp-hr)	CO (gr/hp-hr)
Emission Standards	10	387
Permit N-1326-15	0.24	0.35

The engine meets the emission standards of Section 60.4231(d); therefore, the requirements of this section are satisfied (see EPA Certification in Appendix F) .

Section 60.4234 states that owners and operators of stationary SI ICE must comply with the applicable emission standards over the life of the engine.

The requirements of this section are satisfied by the following condition on the ATC and reference will be added for this subpart in the TV permit unit requirement.

- *Emissions from this IC engine shall not exceed any of the following limits: 0.02 g-NOx/bhp-hr, 0.063 g-PM10/bhp-hr, 0.35 g-CO/bhp-hr, or 0.22 g-VOC/bhp-hr. [District Rule 2201 and 40 CFR 60 Subpart JJJJ] Y*

Monitoring Requirements:

Section 60.4237 (c) states that emergency stationary SI ICE that is less than 130 hp that was built on or after July 1, 2008, must install a non-resettable hour meter if the engine does not meet the standards applicable for non-emergency engines.

The requirements of this section are satisfied by the following condition on the ATC and reference will be added for this subpart in the TV permit unit requirements.

- *This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rules, 2201, 4702, and 40 CFR 60 Subpart JJJJ] Y*

Compliance Requirements:

Section 60.4243 states that owners and operators of stationary SI ICE that were manufactured after July 1, 2008, and must comply with the emission standards in Section 60.4233(a) through (c), must comply by purchasing an engine certified to the emission standards in Section 60.4231(a) through (c). The owner or operator must also comply with (a)(1) and (a)(2):

(1) If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance.

(2) If you do not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance according to (a)(2)(i) through (iii) of this section, as appropriate.

The engine meets the emission standards of Section 60.4231(a); therefore, the requirements of this section are satisfied by the following conditions on the ATC and reference will be added for this subpart in the TV permit unit requirements.

- *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 JJJJ] Y*
- *Emissions from this IC engine shall not exceed any of the following limits: 0.02 g-NOx/bhp-hr, 0.063 g-PM10/bhp-hr, 0.35 g-CO/bhp-hr, or 0.22 g-VOC/bhp-hr. [District Rule 2201 and 40 CFR 60 Subpart JJJJ] Y*

Section 60.4243(d) states that owners and operators of emergency stationary SI ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such limits is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations.

The requirements of this section are satisfied by the following condition on the ATC and reference will be added for this subpart in the TV permit unit requirements.

- *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 100 hours per calendar year. [District Rules 2201 and 4702 and 40 CFR 60 Subpart JJJJ]

Section 60.4243(g) states that an air-to-fuel ratio (AFR) controller is expected to be used with the operation of a three-way catalyst/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

As per information in the ATC project the engine is already equipped with an AFR controller and non-selective catalytic reduction; therefore, the following condition will be added to the TV permit to ensure continued compliance:

- *This IC engine shall be equipped with a three-way catalyst/non-selective catalytic reduction system and air-to-fuel ratio controller and shall be fired on natural gas fuel only. [District Rule 2201 and 40 CFR 60 Subpart JJJJ]*

Notification, Reports, and Records For Owners and Operators:

Section 60.4245(a) states that owners or operators of stationary SI ICE must keep the following records: 1) All notifications submitted to comply with this subpart and all documentation supporting any notification, 2) Maintenance conducted on the engine, 3) If the stationary SI ICE is a certified engine, documentation from the manufacturer that the engine is certified to meet emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

The requirements of this section are satisfied by the following conditions on the ATC and reference will be added for this subpart in the TV permit unit requirements.

- *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 and 40 CFR 60 Subpart JJJJ]*

- *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 and 40 CFR 60 Subpart JJJJ]*

Rule 4002 National Emission Standards for Hazardous Air Pollutants (HAP)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Section 63.6585 states that the provisions of this subpart apply to owners and operators of stationary reciprocating internal combustion engines (RICE) at a major or an area source of HAP emissions. The engine in this project is operated at an area source of HAP emissions (see Appendix D), therefore this subpart applies to the proposed engine.

Since this engine commenced construction after June 12, 2006, it is considered to be a new engine under Section 63.6590(2)(iii). Section 63.6590(c) requires new spark ignited engines to meet the requirements of 40 CFR part 60 subpart JJJJ. As shown earlier, the engine satisfies Subpart JJJJ requirements so no further requirements apply for Subpart ZZZZ.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

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

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

VIII. ATTACHMENTS

- A. Draft Title V Operating Permit N-1326-15-1
- B. Authorities to Construct N-1326-15-0
- C. Emissions Increases
- D. Major HAP Source Determination
- E. Application
- F. Copy of USEPA Engine Certification

ATTACHMENT A

Proposed Modified Title V Operating Permit
N-1326-15-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1326-15-1

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

96 BHP GENERAC MODEL 6.8GN NATURAL GAS-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

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. This IC engine shall be fired on Public Utility Commission (PUC) regulated natural gas only. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
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. This IC engine shall be equipped with a three-way catalyst/non-selective catalytic reduction system and air-to-fuel ratio controller and shall be fired on natural gas fuel only. [District Rule 2201 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
5. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rules, 2201, 4702, and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
6. 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 JJJJ] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed any of the following limits: 0.02 g-NOx/bhp-hr, 0.063 g-PM10/bhp-hr, 0.35 g-CO/bhp-hr, or 0.22 g-VOC/bhp-hr. [District Rule 2201 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
8. 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 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. 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 100 hours per calendar year. [District Rules 2201, 4702, and 40 CFR 60 Subpart JJJJ] 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.

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, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 2201, 4702, and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
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. For units at unstaffed sites or operated remotely, records may be maintained and retained at a District-approved off-site location. [District Rule 4702] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct
N-1326-15-0



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1326-15-0

ISSUANCE DATE: 11/10/2011

LEGAL OWNER OR OPERATOR: MORNING STAR PACKING COMPANY

MAILING ADDRESS: 13448 S VOLTA RD
LOS BANOS, CA 93635

LOCATION: 13448 S VOLTA RD
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

96 BHP GENERAC MODEL 6.8GN NATURAL GAS-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. This IC engine shall be fired on Public Utility Commission (PUC) regulated natural gas only. [District Rules 2201 and 4801]
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
7. 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]
8. Emissions from this IC engine shall not exceed any of the following limits: 0.02 g-NOx/bhp-hr, 0.063 g-PM10/bhp-hr, 0.35 g-CO/bhp-hr, or 0.22 g-VOC/bhp-hr. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-1326-15-0 Nov 10 2011 7:35AM - GILLES Joint Inspection NOT Required

9. 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]
10. 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]
11. 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]
12. 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 100 hours per calendar year. [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. 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. For units at unstaffed sites or operated remotely, records may be maintained and retained at a District-approved off-site location. [District Rule 4702]

ATTACHMENT C

Emissions Increases

ATC	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM ₁₀
N-1326-15-0	0	5	7	0	1
TOTAL	0	5	7	0	1

ATTACHMENT D

Major HAP Source Determination

Potential HAP from N-1326-1, 2, 3, 8, 11, 12, 13

HAP	Emission Factor (lb/MMBtu) ⁽¹⁾	Maximum Annual Emissions (lb/yr) ⁽²⁾
Acetaldehyde	9.00E-07	4
Acrolein	8.00E-07	3
Benzene	1.70E-06	7
1,3-Butadiene	n/a	--
Ethyl benzene	2.00E-06	8
Formaldehyde	3.60E-06	15
Hexane	1.30E-06	5
Naphthalene	3.00E-07	1
PAHs excluding naphthalene	1.00E-07	0
Propylene Oxide	n/a	--
Toluene	7.80E-06	32
Xylene	5.80E-06	24
Total		101
Notes:		
<p>1. These emission factors are obtained from Ventura County APCD, "AB2588 Combustion Emission Factors" natural gas fired external combustion equipment greater than 100 MMBtu/hr, available at http://www.vcapcd.org/pubs/Engineering/AirToxics/combem.pdf</p>		
<p>2. Annual emissions = EF (lb/MMBtu) x 4,166,625 (MMBtu/yr) for all boilers; 33,333 lb-NOx/yr (facility-wide) ÷ 0.008 lb-NOx/MMBtu = 4,166,625 MMBtu/yr</p>		

Potential HAP from N-1329-5-1

HAP	Emission Factor (lb/MMBtu) ⁽¹⁾	Maximum Annual Emissions (lb/yr) ⁽²⁾
Acetaldehyde	7.67E-04	0.1
Acrolein	9.25E-05	0.0
Benzene	9.33E-04	0.2
1,3-Butadiene	3.91E-05	0.0
Ethyl benzene	--	--
Formaldehyde	1.18E-03	0.2
Hexane	n/a	--
Naphthalene	8.48E-05	0.0
PAHs	8.32E-05	0.0
Propylene Oxide	n/a	--
Toluene	4.09E-04	0.1
Xylene	2.85E-04	0.1
Total		0.7
Notes:		
1. The emission are taken from AP-42 Table 3.3-2 (10/96)		
2. Annual Emissions = EF (lb/MMBtu) x 1.77 MMBtu/hr x 100 hr/yr; 12.94 gal/hr x 0.137 MMBtu/gal = 1.77 MMBtu/hr		

Potential HAP from N-1329-14-1

HAP	Emission Factor (lb/MMBtu) ⁽¹⁾	Maximum Annual Emissions (lb/yr) ⁽²⁾
Acetaldehyde	7.67E-04	0.0
Acrolein	9.25E-05	0.0
Benzene	9.33E-04	0.0
1,3-Butadiene	3.91E-05	0.0
Ethyl benzene	--	--
Formaldehyde	1.18E-03	0.1
Hexane	n/a	--
Naphthalene	8.48E-05	0.0
PAHs	8.32E-05	0.0
Propylene Oxide	n/a	--
Toluene	4.09E-04	0.0
Xylene	2.85E-04	0.0
Total		0.2
Notes:		
1. The emission are taken from AP-42 Table 3.3-2 (10/96)		
2. Annual Emissions = EF (lb/MMBtu) x 0.94 MMBtu/hr x 50 hr/yr; 6.89 gal/hr x 0.137 MMBtu/gal = 0.94 MMBtu/hr		

Potential HAP from N-1329-15-0

HAP	Emission Factor (lb/MMBtu) ⁽¹⁾	Maximum Annual Emissions (lb/yr) ⁽²⁾
Acetaldehyde	7.67E-04	0.1
Acrolein	9.25E-05	0.0
Benzene	9.33E-04	0.1
1,3-Butadiene	3.91E-05	0.0
Ethyl benzene	--	--
Formaldehyde	1.18E-03	0.1
Hexane	n/a	--
Naphthalene	8.48E-05	0.0
PAHs	8.32E-05	0.0
Propylene Oxide	n/a	--
Toluene	4.09E-04	0.0
Xylene	2.85E-04	0.0
Total		0.3
Notes:		
1. The emission are taken from AP-42 Table 3.3-2 (10/96)		
2. Annual Emissions = EF (lb/MMBtu) x 0.70 MMBtu/hr x 100 hr/yr; 5.09 gal/hr x 0.137 MMBtu/gal = 0.70 MMBtu/hr		

ATTACHMENT E

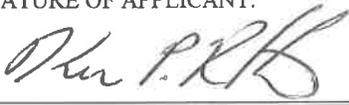
Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Morning Star Packing Company	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>13448 South Volta Road</u> CITY: <u>Los Banos</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93635</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>13448 South Volta Road</u> CITY: <u>Los Banos</u> ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: TBA
4. GENERAL NATURE OF BUSINESS: Agricultural Products Processing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Application to revise Title V permit to include permit N-1326-15-0.	
6. TYPE OR PRINT NAME OF APPLICANT: Kevin Rebelo	TITLE OF APPLICANT: Steam Generating Colleague
7. SIGNATURE OF APPLICANT: 	DATE: <u>1/6/15</u> PHONE: (209) 827-7854 FAX: (209) 826-8266 EMAIL: <u>krebelo@morningstarco.com</u>

For APCD Use Only:

DATE STAMP RECEIVED JAN 12 2015 SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>N1150013</u> FACILITY ID: <u>N-1326</u>

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

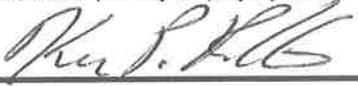
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Morning Star Packing Company	FACILITY ID: N—1326
1. Type of Organization: <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Chris Rufer	
3. Agent to the Owner: Kevin Rebelo	

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

1/6/15
 Date

Kevin Rebelo
 Name of Responsible Official (please print)

Steam Generating Colleague
 Title of Responsible Official (please print)

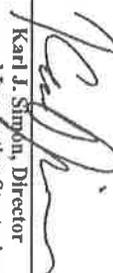
ATTACHMENT F

Copy of USEPA Engine Certification



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
2011 MODEL YEAR
CERTIFICATE OF CONFORMITY
WITH THE CLEAN AIR ACT OF 1990

**OFFICE OF TRANSPORTATION
 AND AIR QUALITY
 ANN ARBOR, MICHIGAN 48105**

Certificate Issued To: Generac Power Systems, Inc. (U.S. Manufacturer or Importer) Certificate Number: BGNXXB06.82L5-023	Effective Date: <u>11/30/2010</u> Expiration Date: <u>12/31/2011</u>	 Karl J. Simon, Director Compliance and Innovative Strategies Division	Issue Date: <u>11/30/2010</u> Revision Date: <u>N/A</u>
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Manufacturer: Generac Power Systems, Inc.
Engine Family: BGNXXB06.82L5
Certificate Number: BGNXXB06.82L5-023
Certification Type: Stationary (Part 60)
Fuel : Natural Gas (CNG/LNG)
Emission Standards : CO (g/kW-hr) : 519
 HC + NOx (g/kW-hr) : 13.4
 NMHC + NOx (g/kW-hr) : 13.4
Emergency Use Only : Y

Pursuant to Section 213 of the Clean Air Act (42 U.S.C. section 7547) and 40 CFR Part 60, 1065, 1068, and 60 (stationary only and combined stationary and mobile) and subject to the terms and conditions prescribed in those provisions, this certificate of conformity is hereby issued with respect to the test engines which have been found to conform to applicable requirements and which represent the following nonroad engines, by engine family, more fully described in the documentation required by 40 CFR Part 60 and produced in the stated model year.

This certificate of conformity covers only those new nonroad spark-ignition engines which conform in all material respects to the design specifications that applied to those engines described in the documentation required by 40 CFR Part 60 and which are produced during the model year stated on this certificate of the said manufacturer, as defined in 40 CFR Part 60. This certificate of conformity does not cover nonroad engines imported prior to the effective date of the certificate.

It is a term of this certificate that the manufacturer shall consent to all inspections described in 40 CFR 1068.20 and authorized in a warrant or court order. Failure to comply with the requirements of such a warrant or court order may lead to revocation or suspension of this certificate for reasons specified in 40 CFR Part 60. It is also a term of this certificate that this certificate may be revoked or suspended or rendered void *ab initio* for other reasons specified in 40 CFR Part 60.

This certificate does not cover large nonroad engines sold, offered for sale, or introduced, or delivered for introduction, into commerce in the U.S. prior to the effective date of the certificate.





2011 EPA SPARK-IGNITED EXHAUST EMISSIONS DATA

Effective in 2009, the EPA has implemented exhaust emissions regulations on stationary spark-ignited (gaseous) engine generators for emergency applications. All Generac spark-ignited gensets, including SG, MG, QTA and QT series gensets, that are built with engines manufactured in 2009 and later meet the requirements of 40CFR part 60 subpart JJJJ and are EPA certified. These generator sets are labeled as EPA Certified with decals affixed to the engines' valve cover(s).

The attached documents summarize the general information relevant to EPA certification on these generator sets. This information can be used for submittal data and for permitting purposes, if required. These documents include the following information:

EPA Engine Family

The EPA Engine Family is assigned by the Manufacturer under EPA guidelines for certification purposes and appears on the EPA certificate.

Catalyst Required

Indicates whether an exhaust catalyst and Air/Fuel Ratio control system are required on the generator set to meet EPA certification requirements. Generally, units rated 80kW and smaller do not require a catalyst to meet EPA certification requirements. Please note that some units that do not require a catalyst to meet EPA requirements do need a catalyst if the California SCAQMD option is selected. Please see "California SCAQMD" below for additional information on this option.

Combination Catalyst or Separate Catalyst

SG and MG series generator sets typically utilize a single combination catalyst/silencer as part of meeting EPA certification requirements. Many QT and QTA series generator sets use the same engines as SG and MG series units, but have different exhaust configurations that require the use of conventional silencers with additional separate catalysts installed.

EPA Certificate Number

Upon certification by the EPA, a Certificate Number is assigned by the EPA.

Emissions Actuals - Grams/bhp-hr

Actual exhaust emission data for Total Hydrocarbons (THC), Nitrogen Oxides (NOx) and Carbon Monoxide (CO) that were submitted to EPA and are official data of record for certification. This data can be used for permitting if necessary. Values are expressed in grams per brake horsepower-hour; to convert to grams/kW-hr, multiply by 1.341. Please see advisory notes below for further information.

California Units, SCAQMD CEP Number

A separate low-emissions option is available on many Generac gaseous-fueled generator sets to comply with the more stringent South Coast Air Quality Management District requirements that are recognized in certain areas in California. Gensets that include this option are also EPA Certified.

General Advisory Note to Dealers

The information provided here is proprietary to Generac and its' authorized dealers. This information may only be disseminated upon request, to regulatory governmental bodies for emissions permitting purposes or to specifying organizations as submittal data when expressly required by project specifications, and shall remain confidential and not open to public viewing. This information is not intended for compilation or sales purposes and may not be used as such, nor may it be reproduced without the expressed written permission of Generac Power Systems, Inc.

Advisory Notes on Emissions Actuals

- The stated values are actual exhaust emission test measurements obtained from units representative of the generator types and engines described.
- Values are official data of record as submitted to the EPA and SCAQMD for certification purposes. Testing was conducted in accordance with prevailing EPA protocols, which are typically accepted by SCAQMD and other regional authorities.
- No emission values provided are to be construed as guarantees of emissions levels for any given Generac generator unit.
- Generac Power Systems reserves the right to revise this information without prior notice.
- Consult state and local regulatory agencies for specific permitting requirements.
- The emissions performance data supplied by the equipment manufacturer is only one element required toward completion of the permitting and installation process. State and local regulations may vary on a case-by-case basis and must be consulted by the permit applicant/equipment owner prior to equipment purchase or installation. The data supplied herein by Generac Power Systems cannot be construed as a guarantee of installability of the generator set.
- The emission values provided are the result of multi-mode, weighted scale testing in accordance with EPA testing regulations, and may not be representative of any specific load point.
- The emission values provided are not to be construed as emission limits.