



JAN 15 2015

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

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # S-377
Project # 1144029**

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 three column dryers for Pistachio Hulling and Drying Operation #2 (S-377-19).

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. 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,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Three Column Dryers

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Application #(s): S-377-19-30
Project #: 1144029
Deemed Complete: October 28, 2014

Date: January 6, 2015
Engineer: Richard Edgehill
Lead Engineer: Allan Phillips *AP SUPP AWE*

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I. **PROPOSAL:**

Paramount Farms (PFI) is requesting to replace ATC S-377-19-29, which authorized four (4) new column dryers, with a new ATC. The new ATC will authorize three column dryers. Facility has no plans to install a fourth dryer. ATC S-377-19-29 will be cancelled upon issuance of this ATC.

The project triggers BACT and offsets. Public notice is not required.

ATC S-377-19-29 and PTO S-377-19-28 are included in **Attachment I**.

PFI Company received their Title V Permit on August 31, 2001. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. PFI must apply to administratively amend their Title V permit.

II. **APPLICABLE RULES:**

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410 Prevention of Significant Deterioration (6/16/11)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)

Rule 4202 Particulate Matter Emissions Rate (12/17/92)
Rule 4301 Fuel Burning Equipment (12/17/92)
Rule 4309 Dryers, Dehydrators, and Ovens (12/15/05)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, 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. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. PROCESS DESCRIPTION:

Pistachios are harvested and hulled as rapidly as possible during the approximately 45 to 60 day season. Freshly harvested pistachios are extremely prone to damage such that a delay in the hulling and drying of harvested pistachios results in stained pistachios, which makes the nuts less valuable. In addition, it could result in the production of aflatoxin, a toxic by-product of molds.

After hulling, the nuts are transferred to column dryers to reduce the moisture content from 30-40% to approximately 7%. After drying, the nuts are conveyed to gravity decks to further separate the blanks prior to storage. The "good" nuts are stored in silos where the moisture is further reduced or maintained at the desired level. After this initial processing, the nuts can be stored, without sustaining damage until final processing.

Proposed Modifications

Three (3) column dryers will be installed.

V. EQUIPMENT LISTING:

Pre-Project Equipment Description:

PTO S-377-19-28: 550.5 MMBTU/HR NATURAL GAS-FIRED PISTACHIO
HULLING AND DRYING OPERATION #2

7 x 28.5 = 199.5 MMBtu/hr bed dryers
13 x 27 = 351 MMBtu/hr column dryers

~~ATC S-377-19-29: MODIFICATION OF 550.5 MMBTU/HR NATURAL GAS-FIRED
PISTACHIO HULLING AND DRYING OPERATION #2: ADD
FOUR 27 MMBTU/HR COLUMN DRYERS WITH~~

~~STAGGERED HEATERS AND FANS AND PREMIUM
EFFICIENCY ELECTRIC MOTORS POWERING FANS AND
AUGERS (TO BE CANCELLED AND REPLACED)~~

Proposed Modification:

ATC S-377-19-30: MODIFICATION OF 550.5 MMBTU/HR NATURAL GAS-FIRED PISTACHIO HULLING AND DRYING OPERATION #2: ADD THREE 27 MMBTU/HR COLUMN DRYERS

Post-Project Equipment Description:

PTO S-377-19-30: 631.5 MMBTU/HR NATURAL GAS-FIRED PISTACHIO HULLING AND DRYING OPERATION #2

7 x 28.5 = 199.5 MMBtu/hr bed dryers
16 x 27 = 432 MMBtu/hr column dryers

VI. EMISSION CONTROL TECHNOLOGY EVALUATION:

The dryers are fired on commercial natural gas. The multiple 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 cool burner temperature, which inherently produces less NO_x than other types of dryers.

VII. CALCULATIONS:

A. Assumptions

- Equipment may operate 24 hours/day, 365 days/year (worst-case)
- No change in emission factors for the column and bed dryers (listed below)
- No change in daily and annual fuel use column dryers (7.0 MMscf/day and 225 MMscf/yr)
- No change in daily and annual fuel use bed dryers (5.25 MMscf/day and 165 MMscf/yr)
- Because the dryers are designed to vent horizontally through perforated openings in the sides it is not possible to capture emissions through a stack and therefore NO_x, SO_x, combustion PM10, CO, and VOC emissions are considered as fugitive emissions for Major Source, Federal and SB 288 Major Modification calculations.

B. Emissions Factors

Source	PM10	SO _x	NO _x	VOC	CO
Facility Dryers	2.5 lb/MMscf	2.85 lb/MMscf	83.2 lb/MMscf	3.8 lb/MMscf	21.0 lb/MMscf

1. Pre-Project Potential to Emit (PE1)

S-377-19 (project 1110267)

Bed and Column Dryers

NO_x: 83.2 lb MMscf x [5.25 MMscf/day + 7 MMscf/day] = 1019.2 lb/day

SO_x: 2.85 lb/MMscf x [5.25 MMscf/day + 7 MMscf/day] = 34.9 lb/yr

PM₁₀: 23.5 lb/MMscf x 5.25 MMscf/day + 2.5 lb/MMscf x 7 MMscf/day] = 140.9 lb/yr

CO: 65.31 lb/MMscf x 5.25 MMscf/day + 21.0 lb/MMscf x 7 MMscf/day = 489.9 lb/yr

VOC: 3.8 lb/MMscf x [5.25 MMscf/day + 7 MMscf/day] = 46.6 lb/yr

Annual heat input limit: 195 MMscf/yr (bed), 255 MMscf/yr (column)

NO_x: 83.2 lb MMscf x [165 MMscf/yr + 225 MMscf/yr] = 32,448 lb/day

SO_x: 2.85 lb/MMscf x [165 MMscf/yr + 225 MMscf/yr] = 1,112 lb/yr

PM₁₀: 23.5 lb/MMscf x 165 MMscf/yr + 2.5 lb/MMscf x 225 MMscf/yr = 4,440 lb/yr

CO: 65.31 lb/MMscf x 165 MMscf/yr + 21.0 lb/MMscf x 225 MMscf/yr = 15,501 lb/yr

VOC: 3.8 lb/MMscf x [165 MMscf/yr + 225 MMscf/yr] = 1,482 lb/yr

Cyclone emissions

0.08 lb/hr/cyclone x 7 cyclones x 24 hr/day = 13.4 lb/day

x 90 days/yr = 1210 lb/yr

S-377-19

Pre Project Potential to Emit (PE1)		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO _x	1019.2	32,448
SO _x	34.9	1,112
PM ₁₀	154.3	5,650
CO	489.9	15,501
VOC	46.6	1,482

2. Post Project Potential to Emit (PE2)

There is no change in emissions.

S-377-19

Post Project Potential to Emit (PE2)		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO _x	1019.2	32,448
SO _x	34.9	1,112
PM ₁₀	154.3	5,650
CO	489.9	15,501
VOC	46.6	1,482

Emissions profiles are included in **Attachment II**.

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 provided an SSPE calculation in **Attachment III**.

SSPE1 (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	85,436	3,699	16,326	45,197	16,532

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
SSPE2	85,436	3,699	16,326	45,197	16,532

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Facility emissions pre-project	85,436	3,699	16,326	45,197	16,532
Facility emissions – post project	85,436	3,699	16,326	45,197	16,532
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	No	No

As seen in the table above, the facility is an existing Major Source for only NO_x.

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)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀
Estimated Facility PE before Project Increase	42.7	8.3	1.8	22.6	8.2	8.2
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown above, the facility is not an existing major source for PSD for at least one pollutant. Therefore the facility is not an existing major source for PSD.

6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 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 District Rule 2201.

As shown in Section VII.C.5 above, the facility is not a Major Source for any pollutant.

Therefore BE=PE1.

As calculated in Section VII.C.1 above, PE1 is summarized in the following table:

BE (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
S-377-19	32,448	1,112	5,650	15,501	1,482

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

As discussed in Section VII.C.5 above, the facility is not a Major Source for SO_x and PM₁₀; therefore, the project does not constitute a SB 288 Major Modification for these air contaminants.

The source is not included in the 28 specific source categories specified in 40 CFR 51.165. Therefore increases in NO_x and VOC fugitive emissions (please see assumptions section) are not included in the SB 288 Major Modification calculation and the project is not a 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. SB 288 Major Modifications are not Federal Major Modifications if they meet the criteria of the "Less-Than-Significant Emissions Increase" exclusion.

A Less-Than-Significant Emissions Increase exclusion is for an emissions increase for the project, or a Net Emissions Increase for the project (as defined in 40 CFR 51.165 (a)(2)(ii)(B) through (D), and (F)), that is not significant for a given regulated NSR pollutant, and therefore is not a Federal Major Modification for that pollutant.

- To determine the post-project projected actual emissions from existing units, the provisions of 40 CFR 51.165 (a)(1)(xxviii) shall be used.
- To determine the pre-project baseline actual emissions, the provisions of 40 CFR 51.165 (a)(1)(xxxv)(A) through (D) shall be used.
- If the project is determined not to be a Federal Major Modification pursuant to the provisions of 40 CFR 51.165 (a)(2)(ii)(B), but there is a reasonable possibility that the project may result in a significant emissions increase, the owner or operator shall comply with all of the provisions of 40 CFR 51.165 (a)(6) and (a)(7).

- Emissions increases calculated pursuant to this section are significant if they exceed the significance thresholds specified in the table below.

Pollutant	Threshold (lb/year)
VOC	0
NOx	0
PM10	30,000
SOx	80,000

The Net Emissions Increases (NEIs) for purposes of determination of a “Less-Than-Significant Emissions Increase” exclusion will be calculated below to determine if this project qualifies for such an exclusion.

As discussed in Section VII.C.5 above, the facility is not a Major Source for SOx and PM10; therefore, the project does not constitute a Federal Major Modification for these air contaminants.

The source is not included in the 28 specific source categories specified in 40 CFR 51.165. Therefore increases in NOx and VOC fugitive emissions are not included in the Federal Major Modification calculation and the project is not a Federal Major Modification.

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

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10

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). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from New and Modified Units	0	0	0	0	0	0
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

*PSD Emission Increase does not include fugitive emissions (from 3 column dryers and sample dryer)

As shown in the table above, the project emission increase, for all new and modified emission units, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable 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-377-19					
Pollutant	NO_x	SO_x	PM₁₀	CO	VOC
PE2 (lb/yr)	32,448	1,112	5,650	15,501	1,482
BE (lb/yr)	32,448	1,112	5,650	15,501	1,482
QNEC	0	0	0	0	0

VIII. COMPLIANCE:

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

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

As seen in Section VII.C.2 of this evaluation, the applicant is proposing to install 3 new column dryers with DELs equal to the following:

Combustion Emissions

NO_x: 83.2 lb/MMscf x 7 MMscf/day = 582.4 lb/day

SO_x: 2.85 lb/MMBtu x 7 MMscf/day = 20.0 lb/day

PM₁₀: 2.5 lb/MMBtu x 7 MMscf/day = 17.5 lb/day

CO: 21.0 lb/MMBtu x 7 MMscf/day = 147.0 lb/day

VOC: 3.8 lb/MMBtu x 7 MMscf/day = 26.6 lb/day

The PE is greater than 2 lb/day for NO_x, SO_x, PM₁₀, CO, and VOC for the dryers and greater than 2 lb/day for PM₁₀ from the cyclones. BACT is triggered for NO_x, SO_x, PM₁₀, and VOC only for the dryers since the PEs are greater than 2 lbs/day; however 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 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 is not triggered.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 and/or Federal Major Modification for NO_x emissions. Therefore BACT is not triggered for any pollutant.

2. BACT Guideline

BACT Guideline 1.6.8 applies to the proposed 3 column dryers (**Attachment IV**).

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 Top-Down BACT Analyses (**Attachment V**) BACT has been satisfied with the following:

NO_x: Low NO_x burner @ 0.083 lb/MMBtu and natural gas fuel.

SO_x, PM₁₀, VOC: Natural gas with LPG a backup fuel.

B. Offsets

1. Offset Applicability

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

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE2	85,436	3,699	16,326	45,197	16,532
Offset Thresholds	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 SSPE2 is greater than the offset thresholds for NO_x only. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for NO_x 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) = ([PE2 – BE] + ICCE) x 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 = PE1 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 = HAE

For this project BE = PE1 and PE2 – BE = 0

Offsets are not required.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE 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 VII.C.7, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE 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.

*27 MMBtu/hr x 0.083 lb NOx/MMBtu x 24 hr/day = 53.8 lb NOx/day

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	85,436	85,436	20,000 lb/year	No
SO _x	3,699	3,699	54,750 lb/year	No
PM ₁₀	16,326	16,326	29,200 lb/year	No
CO	45,197	45,197	200,000 lb/year	No
VOC	16,532	16,532	20,000 lb/year	No

As detailed above, offset thresholds were surpassed for NO_x with this project; therefore public noticing is 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	85,436	85,436	0	20,000 lb/year	No
SO _x	3,699	3,699	0	20,000 lb/year	No
PM ₁₀	16,326	16,326	0	20,000 lb/year	No
CO	45,197	45,197	0	20,000 lb/year	No
VOC	16,532	16,532	0	20,000 lb/year	No

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

2. Public Notice Action

As discussed above, public noticing is not required for this project.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (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:

There are no proposed changes to the current DEL conditions which are:

Maximum daily natural gas consumption of bed type dryers listed above shall not exceed 5.25 MMscf/day. [District NSR Rule] Y

Emission rates for bed type dryers listed above shall not exceed any of the following: PM10: 23.5 lb/MMscf, SOx (as SO2): 2.85 lb/MMscf, NOx (as NO2): 83.20 lb/MMscf, VOC: 3.8 lb/MMscf or CO: 65.31 lb/MMscf. [District NSR Rule] Y

Maximum daily natural gas consumption of column type dryers listed above shall not exceed 7.0 MMscf/day. [District NSR Rule] Y

E. Compliance Assurance

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

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 condition(s) will appear on the permit to operate:

Permittee shall maintain records of the volume of fuel used each day and each year, and records of pre-cleaner cyclone operation per calendar year. Written documentation shall be made readily available to District for a period of five years. [District Rules 1070 and 4102] N

4. Reporting

- No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, 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.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment/minor modification, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment/minor modification application. The Certificate of Compliance is included in **Attachment VI**.

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).

The pre-cleaning lines have PM₁₀ emissions of 0.08 lb/hr; therefore, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity and continued compliance with the requirements of this rule is expected.

Rule 4102 Nuisance

Rule 4102 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 or equal to one. As three of the proposed dryers were previously authorized by ATC S-377-19-29 and there is no increase in emissions, a HRA is not required.

Rule 4201 Particulate Matter Concentration

Section 3.1 of this rule prohibits the discharge of dust, fumes, or total suspended particulate matter emission in excess of 0.1 grain per cubic foot of gas at dry standard conditions. Because the cyclones are expected to be sources of non-combustion PM₁₀ emissions with an emission rate of 0.08 lb/hr, compliance with the requirements of Rule 4201 is expected.

Rule 4202 Particulate Matter Emission Rate

The pre-cleaning lines handle nuts recently removed from the trees and are not expected to have PM₁₀ emissions; therefore, compliance with the requirements of Rule 4202 is expected.

Rule 4301 Fuel Burning Equipment

Section 3.1 defines Fuel Burning Equipment as any furnace, boiler, apparatus, stack, and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. The dryers associated with this process are direct heat transfer units; therefore, the requirements of this rule are not applicable to this permit unit.

Rule 4309 Dryers, Dehydrators, and Ovens

Section 4.1.1 exempts column-type or tower dryers used to dry grains or tree nuts. The sample dryer to be installed at the Madera facility is a column-type dryers used to dry pistachios; therefore, it is not subject to the requirements of this rule.

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.

Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = \frac{n RT}{P}$$

Where:

n = moles SO₂

$$R \text{ (Universal Gas Constant)} = \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$$

$$T \text{ (Standard Temperature)} = 60^\circ\text{F} = 520^\circ\text{R}$$

$$P \text{ (Standard Pressure)} = 14.7 \text{ psi}$$

EPA F-Factor for Natural Gas: 8,710 dscf/MMBtu at 68°F

$$\text{Corrected F - factor} = \left(\frac{8,710 \text{ dscf}}{\text{MMBtu}} \right) \times \left(\frac{60^\circ\text{F} + 459.6}{68^\circ\text{F} + 459.6} \right) = 8,578 \frac{\text{dscf}}{\text{MMBtu}} \text{ at } 60^\circ\text{F}$$

$$\frac{0.00285 \text{ lb} - \text{SO}_x}{\text{MMBtu}} \times \frac{\text{MMBtu}}{8,578 \text{ dscf}} \times \frac{1 \text{ lb} \cdot \text{mol}}{64 \text{ lb}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times \frac{1,000,000 \cdot \text{parts}}{\text{million}} = 1.97 \frac{\text{parts}}{\text{million}}$$

$$\text{Sulfur Concentration} = 1.97 \frac{\text{parts}}{\text{million}} < 2,000 \text{ ppmv (or 0.2\%)},$$

Therefore compliance with District Rule 4801 requirements is expected.

California H&S Code, Section 42301.6

The equipment covered by this application is located more than 1,000 feet from any school; therefore, continued compliance with this regulation is expected.

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.

District is a Lead Agency & GHG emissions increases are from the combustion of fossil fuel other than jet fuels

It is determined that no other agency has prepared or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

On December 17, 2009, the District's Governing Board adopted a policy, APR 2005, *Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*, for addressing GHG emission impacts when the District is Lead Agency under CEQA and approved the District's guidance document for use by other agencies when addressing GHG impacts as lead agencies under CEQA. Under this policy, the District's determination of significance of project-specific GHG emissions is founded on the principal that projects with GHG emission reductions consistent with AB 32 emission reduction targets are considered to have a less than significant impact on global climate change. Consistent with District Policy 2005, projects complying with an approved GHG emission reduction plan or GHG mitigation program, which avoids or substantially reduces GHG emissions within the geographic area in which the project is located, would be determined to have a less than significant individual and cumulative impact for GHG emission.

The California Air Resources Board (ARB) adopted a Cap-and-Trade regulation as part one of the strategies identified for AB 32. This Cap-and-Trade regulation is a statewide plan, supported by a CEQA compliant environmental review document, aimed at reducing or mitigating GHG emissions from targeted industries. Facilities subject to the Cap-and-Trade regulation are subject to an industry-wide cap on overall GHG emissions. Any growth in emissions must be accounted for under that cap such that a corresponding and equivalent reduction in emissions must occur to allow any increase. Further, the cap decreases over time, resulting in an overall decrease in GHG emissions.

Under District policy APR 2025, *CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation*, the District finds that the Cap-and-Trade is a regulation plan approved by ARB, consistent with AB32 emission reduction targets, and supported by a CEQA compliant environmental review document. As such, consistent with District Policy 2005, projects complying project complying with Cap-and-Trade requirements are determined to have a less than significant individual and cumulative impact for GHG emissions.

The GHG emissions increases associated with this project result from the combustion of fossil fuel(s), other than jet fuel, delivered from suppliers subject to the Cap-and-Trade regulation. Therefore, as discussed above, consistent with District Policies APR 2005 and APR 2025, the District concludes that the GHG emissions increases associated with this project would have a less than significant individual and cumulative impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful public comment period, issue Authority to Construct S-377-19-30 subject to the permit conditions on the attached draft Authority to Construct in **Attachment VII**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-377-19-30	3020-02F	631.5 MMBtu/hr	\$607.00

Attachments

- I: ATC S-377-19-29 (to be canceled) and PTO S-377-19-28
- II: Emissions Profiles
- III: SSPE
- IV: BACT Guideline
- V BACT Analysis
- VI: Title V Compliance Certification Form
- VII: Draft ATC

ATTACHMENT I
ATC S-377-19-29 (TO BE CANCELED) and PTO S-377-19-28



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-19-29

ISSUANCE DATE: 08/20/2012

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: 23 **TOWNSHIP:** 25S **RANGE:** 19E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 550.5 MMBTU/HR NATURAL GAS-FIRED PISTACHIO HULLING AND DRYING OPERATION #2:
ADD FOUR 27 MMBTU/HR COLUMN DRYERS WITH STAGGERED HEATERS AND FANS AND PREMIUM EFFICIENCY
ELECTRIC MOTORS POWERING FANS AND AUGERS

CONDITIONS

1. 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. 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
3. Disposal of solid and liquid wastes shall not result in odors nor constitute a nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions in excess of 5% opacity at receiving pits, stickreels, conveyors, conveyor transfer points or trash disposal operations. [District NSR Rule] Federally Enforceable Through Title V Permit
6. There shall be no visible emissions at dryers conveyors aspirators cyclones exhausts. [District NSR Rule] 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-377-19-29, Aug 22 2012 7:58AM - GOUGH0 : Joint Inspection NOT Required

7. Operation shall be equipped with seven receiving pits, seven receiving discharge conveyors, seven pit discharge conveyors, seven cleated belt stickreel conveyors and seven 60 in. stickreels. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Operation shall be equipped with seven precleaner leaf blowers, each with one 44" high-efficiency cyclone preceded by expansion box. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Operation shall be equipped with precleaner discharge conveyors, incline discharge conveyors, trash conveyors, transfer conveyors, and distribution conveyors. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Operation may be equipped with the following permit exempt equipment: pistachio huller/peelers, wash decks, float tanks, gravity decks each with a high efficiency cyclone, size graders, detwiggers, product reclaim line, wet aspirators with cyclones and/or expansion boxes, electric air compressors, electric compressed air dryers, and associated conveyors, hoppers, and elevators. [District Rule 2010] Federally Enforceable Through Title V Permit
11. Operation shall be equipped with four 28.5 MMBtu/hr bed type pistachio dryers, each equipped with: four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, four 40 hp blowers, and one 50 hp blower. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Operation shall be equipped with two 28.5 MMBtu/hr bed type pistachio dryers, each equipped with four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, two 40 hp blowers, and eight 25 hp blowers. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Operation shall be equipped with one 28.5 MMBtu/hr bed type pistachio dryer equipped with four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, two 40 hp blowers, eight 25 hp blowers, and two 40 hp suction fans. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Operation shall be equipped with seventeen 27.0 MMBtu/hr natural gas-fired column type pistachio dryers. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Operation shall be equipped with an operational totalizing fuel flow meter serving bed type dryers listed above. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Operation shall be equipped with an operational totalizing fuel flow meter serving column type dryers listed above. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Operation shall be equipped with dryer discharge conveyors, up to two aspirators each with cyclone and 25 hp blower, and incline conveyors. [District NSR Rule] Federally Enforceable Through Title V Permit
18. All stacks shall remain open during normal operation of four 28.5 MMBtu/hr bed type pistachio dryers. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Maximum emission rate of PM10 from each of the precleaner cyclones listed above shall not exceed 0.08 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
20. All combustion equipment shall be fired with PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Maximum daily natural gas consumption of bed type dryers listed above shall not exceed 5.25 MMscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Maximum annual natural gas consumption of bed type dryers listed above shall not exceed 165 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Emission rates for bed type dryers listed above shall not exceed any of the following: PM10: 23.5 lb/MMscf, SOx (as SO2): 2.85 lb/MMscf, NOx (as NO2): 83.20 lb/MMscf, VOC: 3.8 lb/MMscf or CO: 65.31 lb/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Maximum daily natural gas consumption of column type dryers listed above shall not exceed 7.0 MMscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Maximum annual natural gas consumption of column type dryers listed above shall not exceed 225 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

26. Emission rates for column type dryers listed above shall not exceed any of the following: PM10: 2.5 lb/MMscf, SOx (as SO2): 2.85 lb/MMscf, NOx (as NO2): 83.20 lb/MMscf, VOC: 3.8 lb/MMscf or CO: 21.0 lb/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
27. The column type dryers shall be equipped with staggered heaters and fans with premium efficiency electric motors powering fans and augers or equivalent. [Public Resources Code 21000-21177:California Environmental Quality Act]
28. The bed type pistachio dryers shall be operated and maintained according to manufacturer's specifications. [District Rule 4309] Federally Enforceable Through Title V Permit
29. Operation of each pre-cleaning line cyclone shall not exceed 1500 hours per calendar year. [District Rule 4102]
30. The operator shall maintain daily records showing the bed type pistachio dryers are fired exclusively on PUC quality natural gas, and operation and maintenance records demonstrating operation and maintenance according to manufacturer's specifications. [District Rule 4309] Federally Enforceable Through Title V Permit
31. The operator shall maintain on-site during normal business hours a copy of the manufacturer's operation specifications and maintenance instruction manual for the bed-type dryers, or APCO-approved alternative procedures. [District Rule 4309] Federally Enforceable Through Title V Permit
32. Permittee shall maintain records of the volume of fuel used each day and each year, and records of pre-cleaner cyclone operation per calendar year. Written documentation shall be made readily available to District for a period of five years. [District Rules 1070 and 4102]
33. The unit shall be inspected for visible emissions once during the quarter in which the unit operates. If any visible emissions are observed, corrective action shall be taken. If visible emissions cannot be corrected within 2 hours, a visible emissions test using EPA Method 9 shall be conducted within 48 hours. The results of inspection shall be kept in a record and shall be made available to the District upon request. [District Rule NSR Rule & 2520, 9.3.2] Federally Enforceable Through Title V Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-377-19-28

EXPIRATION DATE: 10/31/2016

SECTION: 23 **TOWNSHIP:** 25S **RANGE:** 19E

EQUIPMENT DESCRIPTION:

550.5 MMBTU/HR NATURAL GAS-FIRED PISTACHIO HULLING AND DRYING OPERATION #2

PERMIT UNIT REQUIREMENTS

1. Disposal of solid and liquid wastes shall not result in odors nor constitute a nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. There shall be no visible emissions in excess of 5% opacity at receiving pits, stickreels, conveyors, conveyor transfer points or trash disposal operations. [District NSR Rule] Federally Enforceable Through Title V Permit
4. There shall be no visible emissions at dryers conveyors aspirators cyclones exhausts. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operation shall be equipped with seven receiving pits, seven receiving discharge conveyors, seven pit discharge conveyors, seven cleated belt stickreel conveyors and seven 60 in. stickreels. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Operation shall be equipped with seven precleaner leaf blowers, each with one 44" high-efficiency cyclone preceded by expansion box. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Operation shall be equipped with precleaner discharge conveyors, incline discharge conveyors, trash conveyors, transfer conveyors, and distribution conveyors. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Operation may be equipped with the following permit exempt equipment: pistachio huller/peelers, wash decks, float tanks, gravity decks each with a high efficiency cyclone, size graders, detwiggers, product reclaim line, wet aspirators with cyclones and/or expansion boxes, electric air compressors, electric compressed air dryers, and associated conveyors, hoppers, and elevators. [District Rule 2010] Federally Enforceable Through Title V Permit
9. Operation shall be equipped with four 28.5 MMBtu/hr bed type pistachio dryers, each equipped with: four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, four 40 hp blowers, and one 50 hp blower. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Operation shall be equipped with two 28.5 MMBtu/hr bed type pistachio dryers, each equipped with four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, two 40 hp blowers, and eight 25 hp blowers. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Operation shall be equipped with one 28.5 MMBtu/hr bed type pistachio dryer equipped with four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, two 40 hp blowers, eight 25 hp blowers, and two 40 hp suction fans. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Operation shall be equipped with thirteen 27.0 MMBtu/hr natural gas-fired column type pistachio dryers. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Operation shall be equipped with an operational totalizing fuel flow meter serving bed type dryers listed above. [District NSR Rule] 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.

14. Operation shall be equipped with an operational totalizing fuel flow meter serving column type dryers listed above. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Operation shall be equipped with dryer discharge conveyors, two aspirators each with cyclone and 25 hp blower, and incline conveyors. [District NSR Rule] Federally Enforceable Through Title V Permit
16. All stacks shall remain open during normal operation of four 28.5 MMBtu/hr bed type pistachio dryers. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Maximum emission rate of PM10 from each of the precleaner cyclones listed above shall not exceed 0.08 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
18. All combustion equipment shall be fired with PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Maximum daily natural gas consumption of bed type dryers listed above shall not exceed 5.25 MMscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Maximum annual natural gas consumption of bed type dryers listed above shall not exceed 165 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Emission rates for bed type dryers listed above shall not exceed any of the following: PM10: 23.5 lb/MMscf, SOx (as SO2): 2.85 lb/MMscf, NOx (as NO2): 83.20 lb/MMscf, VOC: 3.8 lb/MMscf or CO: 65.31 lb/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Maximum daily natural gas consumption of column type dryers listed above shall not exceed 7.0 MMscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Maximum annual natural gas consumption of column type dryers listed above shall not exceed 225 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emission rates for column type dryers listed above shall not exceed any of the following: PM10: 2.5 lb/MMscf, SOx (as SO2): 2.85 lb/MMscf, NOx (as NO2): 83.20 lb/MMscf, VOC: 3.8 lb/MMscf or CO: 21.0 lb/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The bed type pistachio dryers shall be operated and maintained according to manufacturer's specifications. [District Rule 4309] Federally Enforceable Through Title V Permit
26. The operator shall maintain daily records showing the bed type pistachio dryers are fired exclusively on PUC quality natural gas, and operation and maintenance records demonstrating operation and maintenance according to manufacturer's specifications. [District Rule 4309] Federally Enforceable Through Title V Permit
27. The operator shall maintain on-site during normal business hours a copy of the manufacturer's operation specifications and maintenance instruction manual for the bed-type dryers, or APCO-approved alternative procedures. [District Rule 4309] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of the volume of fuel used each day and each year. Written documentation shall be made readily available to District for a period of five years. [District Rule 1070]
29. The unit shall be inspected quarterly for visible emissions during operation. If any visible emissions are observed, corrective action shall be taken. If visible emissions cannot be corrected within 2 hours, a visible emissions test using EPA Method 9 shall be conducted within 48 hours. The results of inspection shall be kept in a record and shall be made available to the District upon request. [District Rule NSR Rule & 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

ATTACHMENT II
Emissions Profile

Permit #: S-377-19-30	Last Updated
Facility: PARAMOUNT FARMS	12/31/2014 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):	32448.0	1112.0	5650.0	15501.0	1482.0
Daily Emis. Limit (lb/Day)	1019.2	34.9	154.3	489.9	46.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

**ATTACHMENT III
SSPE Calculation**

**ATTACHMENT IV
BACT Guideline**

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 1.6.8*

Last Update: 4/14/1995

Pistachio Nut Dryer

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC		Natural gas with LPG as backup fuel	
SOx		PUC quality natural gas with LPG as backup fuel	
PM10		Natural gas with LPG as backup fuel	
NOx	Low NOx burner @ 0.083 lb/MMBtu and natural gas fuel		
CO		Natural gas with LPG as backup fuel	

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 V BACT Analysis

BACT Guideline 1.6.8 – Pistachio Dryers

BACT Analysis for NOx Emissions;

Oxides of nitrogen (NOx) are generated from the high temperature combustion of fuel. A majority of the NOx emissions' are formed from the high temperature reaction of nitrogen and oxygen in the inlet air. The rest of the NOx emissions are formed from the reaction of fuel-bound nitrogen with oxygen in the inlet air.

Step 1 - Identify All Possible NOx Control Technologies

Low NOx burner @ 0.083 lb/MM Btu and natural gas fuel - Achieved in Practice

Step 2 - Eliminate Technologically Infeasible Options

There are no technologically infeasible, options.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

Low NOx burner @ 0.083 lb/MMBtu and natural gas fuel - Achieved in Practice

Step 4 - Cost Effectiveness Analysis.

A cost effective analysis must be performed for all, control options in the list from Step 3 in the order of their ranking to determine the cost effective option with the lowest emissions.

The only control technology alternative in the ranking list from Step 3 has been achieved in practice. Therefore, per SJVUAPCD BACT policy, the cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for NOx emissions is a low NOx burner @ 0.083 lb/MMBtu and natural gas fuel. The facility has proposed a low NOx burner @ 0.083 lb/MMBtu and natural gas fuel; therefore, BACT is satisfied.

BACT Analysis for SOx, PM10, and VOC Emissions:

Step 1 - Identify All Possible Control Technologies

Natural gas with LPG a backup fuel - Technologically feasible

Step 2 - Eliminate Technologically Infeasible Options

There are no technologically infeasible, options.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

Natural gas with LPG a backup fuel - Technologically feasible

Step 4 - Cost Effectiveness Analysis

A cost effective analysis must be performed for all control options in the list from Step 3 in the order of their ranking to determine the cost effective option with the lowest emissions.

The only control technology alternative in the ranking list from Step 3 has been proposed. Therefore, per SJVUAPCD BACT policy, the cost effectiveness' analysis is not required.

Step 5 - Select BACT

BACT for SO_x, PM₁₀, and VOC emissions is natural gas with LPG a backup fuel - Technologically feasible. The facility has proposed combustion of natural gas only. Therefore, BACT is satisfied.

ATTACHMENT VI
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)

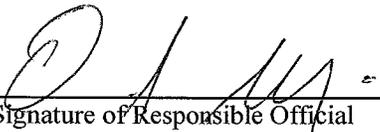
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Paramount Farms International, LLC	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

10/17/2014

Date

Dave Szeflin

Name of Responsible Official (please print)

Vice President of Operations

Title of Responsible Official (please print)

Revise Number of Column Dryers at Huller #2.

ATTACHMENT VII
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-377-19-30

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: 23 **TOWNSHIP:** 25S **RANGE:** 19E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 550.5 MMBTU/HR NATURAL GAS-FIRED PISTACHIO HULLING AND DRYING OPERATION #2:
ADD THREE 27 MMBTU/HR COLUMN DRYERS

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
3. ATC S-377-19-29 is hereby cancelled. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Disposal of solid and liquid wastes shall not result in odors nor constitute a nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. There shall be no visible emissions in excess of 5% opacity at receiving pits, stickreels, conveyors, conveyor transfer points or trash disposal operations. [District NSR Rule] Federally Enforceable Through Title V Permit
7. There shall be no visible emissions at dryers conveyors aspirators cyclones exhausts. [District NSR Rule] 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

Arnaud Marjollet, Director of Permit Services

S-377-19-30 : Jan 6 2015 12:57PM - EDGEHILR : Joint Inspection NOT Required

8. Operation shall be equipped with seven receiving pits, seven receiving discharge conveyors, seven pit discharge conveyors, seven cleated belt stickreel conveyors and seven 60 in. stickreels. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Operation shall be equipped with seven precleaner leaf blowers, each with one 44" high-efficiency cyclone preceded by expansion box. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Operation shall be equipped with precleaner discharge conveyors, incline discharge conveyors, trash conveyors, transfer conveyors, and distribution conveyors. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Operation may be equipped with the following permit exempt equipment: pistachio huller/peelers, wash decks, float tanks, gravity decks each with a high efficiency cyclone, size graders, detwiggers, product reclaim line, wet aspirators with cyclones and/or expansion boxes, electric air compressors, electric compressed air dryers, and associated conveyors, hoppers, and elevators. [District Rule 2010] Federally Enforceable Through Title V Permit
12. Operation shall be equipped with four 28.5 MMBtu/hr bed type pistachio dryers, each equipped with: four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, four 40 hp blowers, and one 50 hp blower. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Operation shall be equipped with two 28.5 MMBtu/hr bed type pistachio dryers, each equipped with four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, two 40 hp blowers, and eight 25 hp blowers. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Operation shall be equipped with one 28.5 MMBtu/hr bed type pistachio dryer equipped with four modified 5.5 MMBtu/hr burners, one modified 6.5 MMBtu/hr burner, two 40 hp blowers, eight 25 hp blowers, and two 40 hp suction fans. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Operation shall be equipped with sixteen 27.0 MMBtu/hr natural gas-fired column type pistachio dryers. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Operation shall be equipped with an operational totalizing fuel flow meter serving bed type dryers listed above. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Operation shall be equipped with an operational totalizing fuel flow meter serving column type dryers listed above. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Operation shall be equipped with dryer discharge conveyors, up to two aspirators each with cyclone and 25 hp blower, and incline conveyors. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All stacks shall remain open during normal operation of four 28.5 MMBtu/hr bed type pistachio dryers. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Maximum emission rate of PM10 from each of the precleaner cyclones listed above shall not exceed 0.08 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
21. All combustion equipment shall be fired with PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Maximum daily natural gas consumption of bed type dryers listed above shall not exceed 5.25 MMscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Maximum annual natural gas consumption of bed type dryers listed above shall not exceed 165 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Emission rates for bed type dryers listed above shall not exceed any of the following: PM10: 23.5 lb/MMscf, SOx (as SO2): 2.85 lb/MMscf, NOx (as NO2): 83.20 lb/MMscf, VOC: 3.8 lb/MMscf or CO: 65.31 lb/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Maximum daily natural gas consumption of column type dryers listed above shall not exceed 7.0 MMscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Maximum annual natural gas consumption of column type dryers listed above shall not exceed 225 MMscf/year. [District NSR Rule] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

27. Emission rates for column type dryers listed above shall not exceed any of the following: PM10: 2.5 lb/MMscf, SOx (as SO2): 2.85 lb/MMscf, NOx (as NO2): 83.20 lb/MMscf, VOC: 3.8 lb/MMscf or CO: 21.0 lb/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
28. The bed type pistachio dryers shall be operated and maintained according to manufacturer's specifications. [District Rule 4309] Federally Enforceable Through Title V Permit
29. Operation of each pre-cleaning line cyclone shall not exceed 1500 hours per calendar year. [District Rule 4102]
30. The operator shall maintain daily records showing the bed type pistachio dryers are fired exclusively on PUC quality natural gas, and operation and maintenance records demonstrating operation and maintenance according to manufacturer's specifications. [District Rule 4309] Federally Enforceable Through Title V Permit
31. The operator shall maintain on-site during normal business hours a copy of the manufacturer's operation specifications and maintenance instruction manual for the bed-type dryers, or APCO-approved alternative procedures. [District Rule 4309] Federally Enforceable Through Title V Permit
32. Permittee shall maintain records of the volume of fuel used each day and each year, and records of pre-cleaner cyclone operation per calendar year. Written documentation shall be made readily available to District for a period of five years. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
33. The unit shall be inspected for visible emissions once during the quarter in which the unit operates. If any visible emissions are observed, corrective action shall be taken. If visible emissions cannot be corrected within 2 hours, a visible emissions test using EPA Method 9 shall be conducted within 48 hours. The results of inspection shall be kept in a record and shall be made available to the District upon request. [District Rule NSR Rule & 2520, 9.3.2] Federally Enforceable Through Title V Permit

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