



Ms. Debra Guzman  
Saputo Cheese USA  
800 E. Paige Ave  
Tulare, CA 92649

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # S-1203  
Project # S-1143491**

Dear Ms. Guzman:

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. Saputo Cheese USA is proposing to install 175 bhp (intermittent) diesel-fired emergency internal combustion (IC) engine powering a firewater pump

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.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
4800 Enterprise Way  
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Ms. Debra Guzman  
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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

**San Joaquin Valley Air Pollution Control District  
Authority to Construct  
Application Review  
Diesel-Fired Emergency Firewater Pump IC Engine**

Facility Name: Saputo Cheese USA

Date: September 23, 2014

Mailing Address: 800 E. Paige Ave.  
Tulare, CA 92649

Engineer: Steve Davidson

Lead Engineer: Dan Klevann

Contact Person: Debra A. Guzman

Telephone: (920) 829-4266

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E-Mail: dguzman@saputo.com

Application #(s): S-1203-24-0

DK 9-25-14

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## **I. Proposal**

Saputo Cheese USA is proposing to install 175 bhp (intermittent) diesel-fired emergency internal combustion (IC) engine powering a firewater pump.

Saputo Cheese USA has a Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). But the facility has requested that this project be processed in that manner; therefore, Saputo Cheese USA must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC issued with this project.

## **II. Applicable Rules**

Rule 2201 New and Modified Stationary Source Review Rule (4/21/14)

Rule 2410 Prevention of Significant Deterioration (12/26/12)

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

Rule 4001 New Source Performance Standards (4/14/99)

Rule 4101 Visible Emissions (2/17/05)

Rule 4102 Nuisance (12/17/92)

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

Rule 4701 Stationary Internal Combustion Engines – Phase 1 (8/21/03)

Rule 4702 Stationary Internal Combustion Engines – Phase 2 (11/14/2013)

Rule 4801 Sulfur Compounds (12/17/92)

CH&SC 41700 Health Risk Assessment

CH&SC 42301.6 School Notice

Title 13 California Code of Regulations (CCR), Section 2423 – Exhaust Emission Standards and Test Procedures, Off-Road Compression-Ignition Engines and Equipment  
Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines  
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 at 800 E. Paige Avenue, Tulare, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable.

### **IV. Process Description**

The emergency engine powers a firewater pump. Other than emergency operation, the engine may be operated up to 100 hours per year for maintenance and testing purposes.

### **V. Equipment Listing**

S-1203-24-0: 175 BHP (INTERMITTENT) JOHN DEER MODEL CLARKE JU6H-UFADMG TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE WITH A PARTICULATE FILTER POWERING A FIREWATER PUMP

### **VI. Emission Control Technology Evaluation**

The engine is equipped with:

- Turbocharger
- Intercooler/aftercooler
- This engine is required to be, and is UL certified
- Catalytic particulate filter
- Very Low (0.0015%) sulfur diesel

The emission control devices/technologies and their effect on diesel engine emissions detailed below are from *Non-catalytic NO<sub>x</sub> Control of Stationary Diesel Engines*, by Don Koeberlein, CARB.

The turbocharger reduces the NO<sub>x</sub> emission rate from the engine by approximately 10% by increasing the efficiency and promoting more complete burning of the fuel.

The intercooler/aftercooler functions in conjunction with the turbocharger to reduce the inlet air temperature. By reducing the inlet air temperature, the peak combustion

temperature is lowered, which reduces the formation of thermal NO<sub>x</sub>. NO<sub>x</sub> emissions are reduced by approximately 15% with this control technology.

The use of very low-sulfur diesel fuel (0.0015% by weight sulfur maximum) reduces SO<sub>x</sub> emissions by over 99% from standard diesel fuel.

## VII. General Calculations

### A. Assumptions

Emergency operating schedule:	24 hours/day
Non-emergency operating schedule:	up to 100 hours/year
Density of diesel fuel:	7.1 lb/gal
EPA F-factor (adjusted to 60 °F):	9,051 dscf/MMBtu
Fuel heating value:	137,000 Btu/gal
BHP to Btu/hr conversion:	2,542.5 Btu/bhp-hr
Thermal efficiency of engine:	commonly ≈ 35%
PM <sub>10</sub> fraction of diesel exhaust:	0.96 (CARB, 1988)

### B. Emission Factors

Emission Factors		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO <sub>x</sub>	2.5	Engine Manufacturer
SO <sub>x</sub>	0.0051	Mass Balance Equation Below
PM <sub>10</sub>	0.12	Engine Manufacturer
CO	1.3	Engine Manufacturer
VOC	0.3	Engine Manufacturer

$$\frac{0.000015 \text{ lb} - S}{\text{lb} - \text{fuel}} \times \frac{7.1 \text{ lb} - \text{fuel}}{\text{gallon}} \times \frac{2 \text{ lb} - SO_2}{1 \text{ lb} - S} \times \frac{1 \text{ gal}}{137,000 \text{ Btu}} \times \frac{1 \text{ bhp input}}{0.35 \text{ bhp out}} \times \frac{2,542.5 \text{ Btu}}{\text{bhp} - \text{hr}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.0051 \frac{\text{g} - SO_x}{\text{bhp} - \text{hr}}$$

### C. Calculations

#### 1. Pre-Project Emissions (PE1)

Since this is a new emissions unit, PE1 = 0.

#### 2. Post Project PE (PE2)

The daily and annual PE are calculated as follows:

Daily Post Project Emissions					
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Conversion (g/lb)	PE2 Total (lb/day)
NO <sub>x</sub>	2.5	175	24	453.6	23.1
SO <sub>x</sub>	0.0051	175	24	453.6	0.0
PM <sub>10</sub>	0.12	175	24	453.6	1.1
CO	1.3	175	24	453.6	12.0
VOC	0.3	175	24	453.6	2.8

Annual Post Project Emissions					
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Annual Hours of Operation (hrs/yr)	Conversion (g/lb)	PE2 Total (lb/yr)
NO <sub>x</sub>	2.5	175	100	453.6	96
SO <sub>x</sub>	0.0051	175	100	453.6	0
PM <sub>10</sub>	0.12	175	100	453.6	5
CO	1.3	175	100	453.6	50
VOC	0.3	175	100	453.6	12

### 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.

<b>SSPE1 (lb/year)<sup>1</sup></b>					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-1203-8-7	2,455	401	7,300	5,001	730
S-1203-9-5	3,942	621	49,458	29,054	1,132
S-1203-10-1	0	0	1,205	0	0
S-1203-11-1	0	0	1,205	0	0
S-1203-12-1	0	0	301	0	0
S-1203-13-0	0	0	409	0	0
S-1203-14-0	0	0	409	0	0
S-1203-15-0	0	0	409	0	0
S-1203-17-1	22	0	1	363	78
S-1203-16-2	15,611	16,343	11,132	64,649	8,238
S-1203-20-1					
S-1203-22-0					
S-1203-21-0	0	0	5,735	0	0
S-1203-23-0	0	0	171	0	0
<b>SSPE1</b>	<b>22,030</b>	<b>17,365</b>	<b>77,735</b>	<b>99,067</b>	<b>10,178</b>

<sup>1</sup>From Project S1203, 1112741

#### 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.

<b>SSPE2 (lb/year)</b>					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-1203-8-7	2,455	401	7,300	5,001	730
S-1203-9-5	3,942	621	49,458	29,054	1,132
S-1203-10-1	0	0	1,205	0	0
S-1203-11-1	0	0	1,205	0	0
S-1203-12-1	0	0	301	0	0
S-1203-13-0	0	0	409	0	0
S-1203-14-0	0	0	409	0	0
S-1203-15-0	0	0	409	0	0
S-1203-17-1	22	0	1	363	78
S-1203-16-2	15,611	16,343	11,132	64,649	8,238
S-1203-20-1					
S-1203-22-0					
S-1203-21-0	0	0	5,735	0	0
S-1203-23-0	0	0	171	0	0
S-1203-24-0	96	0	5	50	12
<b>SSPE2</b>	<b>22,126</b>	<b>17,365</b>	<b>77,740</b>	<b>99,107</b>	<b>10,190</b>

## 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

<b>Rule 2201 Major Source Determination (lb/year)</b>						
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	VOC
SSPE1	22,030	17,365	77,735	77,735	99,067	10,178
SSPE2	22,126	17,365	77,740	77,740	99,107	10,190
Major Source Threshold	20,000	140,000	140,000	200,000	200,000	20,000
Major Source?	Yes	No	No	No	No	No

Note: PM2.5 assumed to be equal to PM10

As seen in the table above, the facility is an existing Major Source for NO<sub>x</sub> and it is not becoming a Major Source for any other criteria pollutant as a result of this project.

**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.

<b>PSD Major Source Determination (tons/year)</b>						
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Estimated Facility PE before Project Increase	11	5.1	8.7	49.5	38.9	38.9
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 PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

**6. Baseline Emissions (BE)**

The BE calculation (in lb/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.

Since this is a new emissions unit, BE = PE1 = 0 for all pollutants.

## 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."

Since this facility is a major source for NO<sub>x</sub>, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO <sub>x</sub>	96	50,000	No
SO <sub>x</sub>	0	80,000	No
PM <sub>10</sub>	5	30,000	No
VOC	12	50,000	No

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

## 8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

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

### Step 1

For new emissions units, the increase in emissions is equal to the PE2 for each new unit included in this project.

The project's emission increases are compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr) *	Thresholds (lb/yr)	Federal Major Modification?
NO <sub>x</sub> *	0	0	No
VOC*	0	0	No
PM <sub>10</sub>	0	30,000	No
PM <sub>2.5</sub>	0	20,000	No
SO <sub>x</sub>	0	80,000	No

\* Per District policy any increases of less than 0.5 lb/day (annual emissions / 365) round to zero for NSR purposes.

Since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

## 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)

- NO<sub>2</sub> (as a primary pollutant)
- SO<sub>2</sub> (as a primary pollutant)
- CO
- PM
- PM<sub>10</sub>

### I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

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.

<b>PSD Major Source Determination: Potential to Emit (tons/year)</b>						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from New and Modified Units	0.0	0.0	0.0	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

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

### 10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix I.

## VIII. Compliance

### Rule 2201 New and Modified Stationary Source Review Rule

#### A. Best Available Control Technology (BACT)

##### 1. BACT Applicability

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

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

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

As seen in Section VII.C.2 above, the applicant is proposing to install a new diesel-fired IC engine with a PE greater than 2 lb/day for NO<sub>x</sub>, CO, and VOC. BACT is triggered for NO<sub>x</sub>, and VOC only since the PEs are greater than 2

lb/day. However BACT is not triggered for CO since the SSPE2 for CO is not greater than 200,000 lb/year, as demonstrated in Section VII.C.5 above.

**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. Therefore BACT is not triggered for any pollutant.

**2. BACT Guideline**

BACT Guideline 3.1.4, 3rd quarter 2014, which appears in Appendix A of this report, covers diesel-fired emergency IC engines powering a firewater pump.

**3. Top Down BACT Analysis**

Per District Policy APR 1305, Section IX, “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 for source categories or classes covered in the BACT Clearinghouse, relevant information under each of the following steps may be simply cited from the Clearinghouse without further analysis.”

Pursuant to the attached Top-Down BACT Analysis, which appears in Appendix A of this report, BACT is satisfied with:

NO<sub>x</sub>: Certified NO<sub>x</sub> emissions of 6.9 g/bhp-hr or less  
VOC: No control technology for VOC emissions

- {edited 3485} Emissions from this IC engine shall not exceed any of the following limits: 2.5 g-NO<sub>x</sub>/bhp-hr, 1.3 g-CO/bhp-hr, or 0.3 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]

## **B. Offsets**

Since emergency IC engines are exempt from the offset requirements of Rule 2201, per Section 4.6.2, offsets are not required for this engine, and no offset calculations are 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 SSPE of greater than 20,000 lb/year for any pollutant.
- e. Any project which results in a Title V significant permit modification

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

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

As demonstrated in Sections VII.C.7 and VII.C.8, this project 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.

#### **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 <sub>x</sub>	22,030	22,126	20,000 lb/year	No
SO <sub>x</sub>	17,365	17,365	54,750 lb/year	No
PM <sub>10</sub>	77,735	77,740	29,200 lb/year	No
CO	99,067	99,170	200,000 lb/year	No
VOC	10,178	10,190	20,000 lb/year	No

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

**d. SSIPE > 20,000 lb/year**

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

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO <sub>x</sub>	22,126	22,030	96	20,000 lb/year	No
SO <sub>x</sub>	17,365	17,365	0	20,000 lb/year	No
PM <sub>10</sub>	77,740	77,735	5	20,000 lb/year	No
CO	99,170	99,067	103	20,000 lb/year	No
VOC	10,190	10,178	12	20,000 lb/year	No

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

**e. Title V Significant Permit Modification**

As shown in the Discussion of Rule 2520 below, this project does not constitute a Title V significant modification. Therefore, public noticing for Title V significant modifications is not required for this project.

**2. Public Notice Action**

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

## **D. Daily Emissions Limits**

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. 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.

For this emergency IC engine, the DELs are stated in the form of emission factors, the maximum engine horsepower rating, and the maximum operational time of 24 hours per day. Therefore, the following conditions (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {edited 3485} Emissions from this IC engine shall not exceed any of the following limits: 2.5 g-NO<sub>x</sub>/bhp-hr, 1.3 g-CO/bhp-hr, or 0.3 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
- {edited 3486} Emissions from this IC engine shall not exceed 0.12 g-PM<sub>10</sub>/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

In addition, the DEL for SO<sub>x</sub> is established by the sulfur content of the fuel being combusted in the engine. Therefore, the following condition will be listed on the ATC to ensure compliance:

- {3395} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]

## **E. Compliance Assurance**

### **1. Source Testing**

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

### **2. Monitoring**

No monitoring is required to demonstrate compliance with Rule 2201.

### **3. Recordkeeping**

Recordkeeping is required to demonstrate compliance with the offset, public notification, and daily emission limit requirements of Rule 2201. As required by District Rule 4702, *Stationary Internal Combustion Engines - Phase 2*, this IC

engine is subject to recordkeeping requirements. Recordkeeping requirements, in accordance with District Rule 4702, will be discussed in Section VIII, *District Rule 4702*, of this evaluation.

#### **4. Reporting**

No reporting is required to ensure compliance with Rule 2201.

#### **Rule 2410 Prevention of Significant Deterioration**

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

#### **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 pursuant to Section 3.20 of this rule. As discussed previously in the proposal section, the facility has applied for a Certificate of Conformity (COC). Therefore, the following conditions will be listed on the ATC:

- {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 NSR Rule]
- {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]

In addition, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected.

#### **Rule 4001 New Source Performance Standards (NSPS)**

#### **40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

##### §60.4200 - Applicability

This subpart is applicable to owners and operators of stationary compression ignited internal combustion engines that commence construction after July 11, 2005, where the engines are:

- 1) Manufactured after April 1, 2006, if not a fire pump engine.

- 2) Manufactured as a National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

Since the proposed engine powers a fire pump engine this subpart applies.

#### **Rule 4002 National Emission Standards for Hazardous Air Pollutants**

##### **40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Emissions (RICE)**

Emergency engines are subject to this subpart if they are operated at a major or area source of Hazardous Air Pollutant (HAP) emissions. A major source of HAP emissions is a facility that has the potential to emit any single HAP at a rate of 10 tons/year or greater or any combinations of HAPs at a rate of 25 tons/year or greater. An area source of HAPs is a facility is not a major source of HAPs. The proposed engine(s) are new stationary RICE located at an area source of HAP emissions; therefore, these engines are subject to this Subpart.

40 CFR 63 Subpart ZZZZ requires the following engines to comply with 40 CFR 60 Subpart IIII:

1. New emergency engines located at area sources of HAPs
2. Emergency engines rated less than or equal to 500 bhp and located at major sources of HAPs

The proposed engine will be in compliance with 40 CFR 60 Subpart IIII.

Additionally, 40 CFR 63 Subpart ZZZZ requires engines rated greater 500 bhp and located at major sources of HAPs to meet the notification requirements of §63.6645(h); however, that section only applies if an initial performance test is required. Since an initial performance test is not required for emergency engines, the notification requirement is not applicable.

The proposed engine is expected to be in compliance with 40 CFR 63 Subpart ZZZZ.

#### **Rule 4101 Visible Emissions**

Rule 4101 states that 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. Therefore, the following condition will be listed on the ATC to ensure compliance:

- {15} 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]

**Rule 4102 Nuisance**

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, the following condition will be listed on the ATC to ensure compliance:

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

**California Health & Safety Code 41700 (Health Risk Assessment)**

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources (dated 3/2/01) 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.

Therefore pursuant to the policy, a risk management review has been performed for this project to analyze the impact of toxic emissions. For projects where the increase in cancer risk is greater than one per million, Toxic Best Available Control Technology (T-BACT) is required.

The HRA results for this project are shown below (see the HRA Summary in Appendix B):

HRA Results				
Unit	Acute Hazard Index	Chronic Hazard Index	Cancer Risk	T-BACT Required?
S-1203-3-24	N/A	N/A	0.13 in a million	No

As demonstrated previously, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary in Appendix B of this report, the emissions increases for this project was determined to be less than significant.

Therefore, the following conditions will be listed on the ATC to ensure compliance:

- The PM10 emissions rate shall not exceed 0.09 g/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
- {3488} This engine shall be operated only for maintenance, testing, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115] N

#### Rule 4201 Particulate Matter Concentration

Particulate matter emissions from the engine will be less than or equal to the rule limit of 0.1 grain per cubic foot of gas at dry standard conditions as shown by the following:

Note: Adjust the following equation for the specific PM<sub>10</sub> emission factor for the engine(s) involved with this project. Add more calculations for multiple engines.

$$0.1 \frac{g - PM_{10}}{bhp - hr} \times \frac{1g - PM}{0.96g - PM_{10}} \times \frac{1bhp - hr}{2,542.5 Btu} \times \frac{10^6 Btu}{9,051 dscf} \times \frac{0.35 Btu_{out}}{1 Btu_{in}} \times \frac{15.43 grain}{g} = 0.0293 \frac{grain - PM}{dscf}$$

Since 0.0293 grain-PM/dscf is ≤ to 0.1 grain per dscf, compliance with Rule 4201 is expected.

Therefore, the following condition will be listed on the ATC to ensure compliance:

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

#### Rule 4701 Internal Combustion Engines – Phase 1

Pursuant to Section 7.5.2.3 of District Rule 4702, as of June 1, 2006 District Rule 4701 is no longer applicable to diesel-fired emergency standby or emergency IC engines. Therefore, this diesel-fired emergency IC engine will comply with the requirements of District Rule 4702 and no further discussion is required.

## **Rule 4702 Internal Combustion Engines – Phase 2**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SO<sub>x</sub>) from internal combustion engines.

This rule applies to any internal combustion engine with a rated brake horsepower greater than 25 horsepower.

Pursuant to Section 4.3, except for the requirements of Section 6.2.3, the requirements of this rule shall not apply to an internal combustion engine that meets the following conditions:

- 1) The engine is operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood, and
- 2) Except for operations associated with Section 4.3.1.1, the engine is limited to operate no more than 100 hours per calendar year as determined by an operational nonresettable elapsed operating time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine, and
- 3) The engine is operated with a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Therefore, the emergency IC engine involved with this project will only have to meet the requirements of Section 6.2.3 of this Rule.

Section 6.2.3 requires that an owner claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and submitted to the APCO upon request and at the end of each calendar year in a manner and form approved by the APCO. Therefore, the following conditions will be listed on the ATC to ensure compliance:

- {3809} 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 and 17 CCR 93115]
- {3489} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly

testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]

- {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]
- {3404} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
- {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]

### Rule 4801 Sulfur Compounds

Rule 4801 requires that sulfur compound emissions (as SO<sub>2</sub>) shall not exceed 0.2% by volume. Using the ideal gas equation, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = (n \times R \times T) \div P$$

n = moles SO<sub>2</sub>

T (standard temperature) = 60 °F or 520 °R

$$R \text{ (universal gas constant)} = \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$$

$$\frac{0.000015 \text{ lb} - \text{S}}{\text{lb} - \text{fuel}} \times \frac{7.1 \text{ lb}}{\text{gal}} \times \frac{64 \text{ lb} - \text{SO}_2}{32 \text{ lb} - \text{S}} \times \frac{1 \text{ MMBtu}}{9,051 \text{ scf}} \times \frac{1 \text{ gal}}{0.137 \text{ MMBtu}} \times \frac{\text{lb} - \text{mol}}{64 \text{ lb} - \text{SO}_2} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} - \text{mol} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times 1,000,000 = 1.0 \text{ ppmv}$$

Since 1.0 ppmv is ≤ 2,000 ppmv, this engine is expected to comply with Rule 4801. Therefore, the following condition (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {3395} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]

### California Health & Safety Code 42301.6 (School Notice)

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

**Title 13 California Code of Regulations (CCR), Section 2423 – Exhaust Emission Standards and Test Procedures, Off-Road Compression-Ignition Engines and Equipment (Required by Title 17 CCR, Section 93115 for New Emergency Diesel IC Engines)**

Particulate Matter and VOC + NO<sub>x</sub>, and CO Exhaust Emissions Standards:

This regulation stipulates that off-road compression-ignition engines shall not exceed the following applicable emissions standards.

Title 13 CCR, Section 2423 lists a diesel particulate emission standard of 0.15 g/bhp-hr (with 1.341 bhp/kW, equivalent to 0.20 g/kW-hr) for 2003 - 2005 model year engines with maximum power ratings of 174.3 - 301.6 bhp (equivalent to 130 - 225 kW). The PM standards given in Title 13 CCR, Section 2423 are less stringent than the PM standards given in Title 17 CCR, Section 93115 (ATCM), thus the ATCM standards are the required standards and will be discussed in the following section.

Title 17 CCR, Section 93115, (e)(2)(A)(3)(b) stipulates that new stationary emergency diesel-fueled CI engines (> 50 bhp) must meet the VOC + NO<sub>x</sub>, and CO standards for off-road engines of the same model year and maximum rated power as specified in the Off-Road Compression-Ignition Engine Standards (Title 13 CCR, Section 2423) or the Tier 1 standards for an off-road engine if no standards have been established for an off-road engine of the same model year and maximum rated power.

In addition, Title 17 CCR, Section 93115, (e)(2)(A)(4)(a)(II) allows new direct-drive emergency fire pump engines to meet the Off-Road Compression Ignition Engine Standards for off-road engines with the same maximum rated power (title 13 CCR, section 2423) three years after the date the standards are applicable for off-road engines with the same maximum rated power. For this project the proposed emergency diesel IC engine will be used to power a firewater pump, but it is not a new installation. Therefore, the proposed emergency diesel IC engine will have to meet the Tier 2 and Tier 3 emission standards specified in the Off-Road Compression Ignition Engine Standards for off-road engines on the applicable dates specified.

The engine involved with this project is a certified 2013 model engine. The following table compares the requirements of Title 13 CCR, Section 2423 to the emissions factors for the 175 bhp John Deere Model Clarke JU6H-UFADMG diesel-fired emergency IC engine as given by the manufacturer.

Requirements of Title 13 CCR, Section 2423

Source	Maximum Rated Power	Model Year	NO <sub>x</sub>	VOC	NO <sub>x</sub> + VOC	CO	PM
Title 13 CCR, §2423	174.3 – 301.6 bhp (130 - 225 kW)	1996-2002 (Tier 1)	6.9 g/bhp-hr (9.2 g/kW-hr)	1.0 g/bhp-hr (1.3 g/kW-hr)	--	8.5 g/bhp-hr (11.4 g/kW-hr)	0.40 g/bhp-hr (0.54 g/kW-hr)
Title 13 CCR, §2423	174.3 – 301.6 bhp (130 - 225 kW)	2003-2005 (Tier 2)	--	--	4.9 g/bhp-hr (6.6 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
Title 13 CCR, §2423	174.3 – 301.6 bhp (130 - 225 kW)	2006 and later (Tier 3)	--	--	3.0 g/bhp-hr (4.0 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
John Deere Model Clarke JU6H-UFADMG	175 bhp	2013 (Tier 3)	2.5 g/bhp-hr (3.3 g/kW-hr)	0.2 g/bhp-hr (0.3 g/kW-hr)	2.7 g/bhp-hr (3.6 g/kW-hr)	1.0 g/bhp-hr (1.3 g/kW-hr)	0.09 g/bhp-hr (1.0 g/kW-hr)
Meets Standard?			N/A	N/A	Yes	Yes	Yes

As presented in the table above, the proposed engine will satisfy the requirements of this section and compliance is expected.

Right of the District to Establish More Stringent Standards:

This regulation also stipulates that the District:

1. May establish more stringent diesel PM, NO<sub>x</sub> + VOC, VOC, NO<sub>x</sub>, and CO emission rate standards; and
2. May establish more stringent limits on hours of maintenance and testing on a site-specific basis; and
3. Shall determine an appropriate limit on the number of hours of operation for demonstrating compliance with other District rules and initial start-up testing

The District has not established more stringent standards at this time. Therefore, the standards previously established in this Section will be utilized.

**Title 13 California Code of Regulations (CCR), Section 2423 – Exhaust Emission Standards and Test Procedures, Off-Road Compression-Ignition Engines and Equipment (Required by Title 17 CCR, Section 93115 for New Emergency Diesel IC Engines)**

Particulate Matter and VOC + NO<sub>x</sub>, and CO Exhaust Emissions Standards:

This regulation stipulates that off-road compression-ignition engines shall not exceed the following applicable emissions standards.

Title 13 CCR, Section 2423 lists a diesel particulate emission standard of 0.15 g/bhp-hr (with 1.341 bhp/kW, equivalent to 0.20 g/kW-hr) for 2003 - 2005 model year engines with maximum power ratings of 174.3 - 301.6 bhp (equivalent to 130 - 225 kW). The PM standards given in Title 13 CCR, Section 2423 are less stringent than the PM

standards given in Title 17 CCR, Section 93115 (ATCM), thus the ATCM standards are the required standards and will be discussed in the following section.

Title 17 CCR, Section 93115, (e)(2)(A)(3)(b) stipulates that new stationary emergency diesel-fueled CI engines (> 50 bhp) must meet the VOC + NO<sub>x</sub>, and CO standards for off-road engines of the same model year and maximum rated power as specified in the Off-Road Compression-Ignition Engine Standards (Title 13 CCR, Section 2423) or the Tier 1 standards for an off-road engine if no standards have been established for an off-road engine of the same model year and maximum rated power.

In addition, Title 17 CCR, Section 93115, (e)(2)(A)(4)(a)(II) allows new direct-drive emergency fire pump engines to meet the Tier 2 emission standards specified in the Off-Road Compression Ignition Engine Standards for off-road engines with the same maximum rated power (title 13 CCR, section 2423) until three years after the date the Tier 3 standards are applicable for off-road engines with the same maximum rated power. At that time, new direct-drive emergency diesel-fueled fire-pump engines (>50 bhp) are required to meet the Tier 3 emission standards, until three years after the date the Tier 4 standards are applicable for off-road engines with the same maximum rated power. At that time, new direct-drive emergency diesel-fueled fire-pump engines (>50 bhp) are required to meet the Tier 4 emission standards; and not operate more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 – "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 1998 edition, which is incorporated herein by reference. In addition, this subsection does not limit engine operation for emergency use and for emission testing to show compliance with (e)(2)(A)4. For this project the proposed emergency diesel IC engine will be used to power a firewater pump and is therefore allowed to meet the 3 emission standards specified in the Off-Road Compression Ignition Engine Standards for off-road engines three years after the applicable dates specified. This additional three-year allowance is reflected in the following table.

The engine involved with this project is a certified 2013 model engine. The following table compares the requirements of Title 13 CCR, Section 2423 to the emissions factors for the 175 bhp John Deere Model Clarke JU6H-UFADMG diesel-fired emergency IC engine as given by the manufacturer.

Requirements of Title 13 CCR, Section 2423

Source	Maximum Rated Power	Model Year	NO <sub>x</sub>	VOC	NO <sub>x</sub> + VOC	CO	PM
Title 13 CCR, §2423	174.3 – 301.6 bhp (130 - 225 kW)	1996-2002 (Tier 1)	6.9 g/bhp-hr (9.2 g/kW-hr)	1.0 g/bhp-hr (1.3 g/kW-hr)	--	8.5 g/bhp-hr (11.4 g/kW-hr)	0.40 g/bhp-hr (0.54 g/kW-hr)
Title 13 CCR, §2423	174.3 – 301.6 bhp (130 - 225 kW)	2003-2005, extended to 2008 (Tier 2)	--	--	4.9 g/bhp-hr (6.6 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
Title 13 CCR, §2423	174.3 – 301.6 bhp (130 - 225 kW)	2006 and later, extended to 2009 (Tier 3)	--	--	3.0 g/bhp-hr (4.0 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
John Deere Model Clarke JU6H-UFADMG	175 bhp	2013 (Tier 3)	2.5 g/bhp-hr (3.3 g/kW-hr)	0.2 g/bhp-hr (0.3 g/kW-hr)	2.7 g/bhp-hr (3.6 g/kW-hr)	1.0 g/bhp-hr (1.3 g/kW-hr)	0.09 g/bhp-hr (0.12 g/kW-hr)
Meets Standard?			N/A	N/A	Yes	Yes	Yes

As presented in the table above, the proposed engine will satisfy the requirements of this section and compliance is expected.

**Title 17 California Code of Regulations (CCR), Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines**

Emergency Operating Requirements:

This regulation stipulates that no owner or operator shall operate any new or in-use stationary diesel-fueled compression ignition (CI) emergency standby engine, in response to the notification of an impending rotating outage, unless specific criteria are met.

This section applies to emergency standby IC engines that are permitted to operate during non-emergency conditions for the purpose of providing electrical power. However, District Rule 4702 states that emergency standby IC engines may only be operated during non-emergency conditions for the purposes of maintenance and testing. Therefore, this section does not apply and no further discussion is required.

Fuel and Fuel Additive Requirements:

This regulation also stipulates that as of January 1, 2006 an owner or operator of a new or in-use stationary diesel-fueled CI emergency standby engine shall fuel the engine with CARB Diesel Fuel.

Since the engine involved with this project is a new or in-use stationary diesel-fueled CI emergency standby engine, these fuel requirements are applicable. Therefore, the following condition (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {3395} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]

At-School and Near-School Provisions:

This regulation stipulates that no owner or operator shall operate a new stationary emergency diesel-fueled CI engine, with a PM<sub>10</sub> emissions factor > than 0.01 g/bhp-hr, for non-emergency use, including maintenance and testing, during the following periods:

1. Whenever there is a school sponsored activity, if the engine is located on school grounds, and
2. Between 7:30 a.m. and 3:30 p.m. on days when school is in session, if the engine is located within 500 feet of school grounds.

The District has verified that the engine is not located within 500 feet of a K-12 school. Therefore, conditions prohibiting non-emergency usage of the engine during school hours will not be placed on the permit.

Recordkeeping Requirements:

This regulation stipulates that as of January 1, 2005, each owner or operator of an emergency diesel-fueled CI engine shall keep a monthly log of usage that shall list and document the nature of use for each of the following:

- a. Emergency use hours of operation;
- b. Maintenance and testing hours of operation;
- c. Hours of operation for emission testing;
- d. Initial start-up hours; and
- e. If applicable, hours of operation to comply with the testing requirements of National Fire Protection Association (NFPA) 25 — "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 1998 edition;
- f. Hours of operation for all uses other than those specified in sections 'a' through 'd' above; and
- g. For in-use emergency diesel-fueled engines, the fuel used. The owner or operator shall document fuel use through the retention of fuel purchase records that account for all fuel used in the engine and all fuel purchased for use in the engine, and, at a minimum, contain the following information for each individual fuel purchase transaction:
  - I. Identification of the fuel purchased as either CARB Diesel, or an alternative diesel fuel that meets the requirements of the Verification Procedure, or an alternative fuel, or CARB Diesel fuel used with additives that meet the requirements of the Verification Procedure, or any combination of the above;
  - II. Amount of fuel purchased;
  - III. Date when the fuel was purchased;

- IV. Signature of owner or operator or representative of owner or operator who received the fuel; and
- V. Signature of fuel provider indicating fuel was delivered.

The proposed new emergency diesel IC engine powering a firewater pump is exempt from the operating hours limitation provided the engine is only operated the amount of hours necessary to satisfy National Fire Protection Association (NFPA) regulations. Therefore, the following conditions (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {3489} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
- {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

#### PM Emissions and Hours of Operation Requirements for New Diesel Engines:

This regulation stipulates that as of January 1, 2005, no person shall operate any new stationary emergency diesel-fueled CI engine that has a rated brake horsepower greater than 50, unless it meets all of the following applicable emission standards and operating requirements.

1. Emits diesel PM at a rate greater than 0.01 g/bhp-hr or less than or equal to 0.15 g/bhp-hr; or
2. Meets the current model year diesel PM standard specified in the Off-Road Compression Ignition Engine Standards for off-road engines with the same maximum rated power (Title 13 CCR, Section 2423), whichever is more stringent; and
3. Does not operate more than 50 hours per year for maintenance and testing purposes. Engine operation is not limited during emergency use and during emissions source testing to show compliance with the ATCM.

The proposed emergency diesel IC engine powering a firewater pump is exempt from the PM emissions rate limitation because the engine is rated at 49.6 to 174.2 bhp (as discussed previously in the Title 13 CCR, Section 2423 compliance section) and is also exempt from the operating hours limitation provided the engine is only operated the amount of hours necessary to satisfy National Fire Protection Association (NFPA)

regulations. Therefore, the following conditions (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {edited 3486} Emissions from this IC engine shall not exceed 0.09 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
- {3816} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
- {3809} 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 and 17 CCR 93115]

#### PM Emissions and Hours of Operation Requirements for New Diesel Engines:

This regulation stipulates that as of January 1, 2005, no person shall operate any new stationary emergency diesel-fueled CI engine that has a rated brake horsepower greater than 50, unless it meets all of the following applicable emission standards and operating requirements.

1. Emits diesel PM at a rate greater than 0.01 g/bhp-hr or less than or equal to 0.15 g/bhp-hr; or
2. Meets the current model year diesel PM standard specified in the Off-Road Compression Ignition Engine Standards for off-road engines with the same maximum rated power (Title 13 CCR, Section 2423), whichever is more stringent; and
3. Does not operate more than 50 hours per year for maintenance and testing purposes. Engine operation is not limited during emergency use and during emissions source testing to show compliance with the ATCM.

The proposed emergency diesel IC engine powering a firewater pump is exempt from the operating hours limitation provided the engine is only operated the amount of hours necessary to satisfy National Fire Protection Association (NFPA) regulations. Therefore, the following conditions (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {edited 3486} Emissions from this IC engine shall not exceed 0.09 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
- {3816} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

### **California Environmental Quality Act (CEQA)**

The California Environmental Quality Act (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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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.

Consistent with California Environmental Quality Act (CEQA) and CEQA Guidelines requirements, the San Joaquin Valley Air Pollution Control District (District) has adopted procedures and guidelines for implementing CEQA. The District's Environmental Review Guidelines (ERG) establishes procedures for avoiding unnecessary delay during the District's permitting process while ensuring that significant environmental impacts are thoroughly and consistently addressed. The ERG includes policies and procedures to be followed when processing permits for projects that are exempt under CEQA.

The State Legislature granted a number of exemptions from CEQA, including projects that require only ministerial approval. Based upon analysis of its own laws and consideration of CEQA provisions, the District has identified a limited number of District permitting activities considered to be ministerial approvals. As set forth in §4.2.1 of the ERG, projects permitted consistent with the District's *Guidelines for Expedited Application Review* (GEAR) are standard application reviews in which little or no discretion is used in issuing Authority to Construct (ATC) documents.

For the proposed project, the District performed an Engineering Evaluation (this document) and determined that the project qualifies for processing under the procedures set forth in the District's Permit Services Procedures Manual in the Guidelines for Expedited Application Review (GEAR). Thus, as discussed above, this issuance of such ATC(s) is a ministerial approval for the District and is not subject to CEQA provisions.

#### **IX. Recommendation**

Pending a successful EPA 45-day COC comment period, issue Authority to Construct S-1203-24-0 subject to the permit conditions on the attached draft Authority to Construct in Appendix E.

#### **X. Billing Information**

<b>Billing Schedule</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Fee Amount</b>
S-1203-24-0	3020-10-B	175 bhp IC engine	\$117.00

#### **Appendixes**

- A. BACT Guideline and BACT Analysis
- B. HRA Summary
- C. QNEC Calculations
- D. Draft ATC
- E. Title V Compliance Certification Form

# Appendix A

## BACT Guideline and BACT Analysis

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 3.1.4\***

Last Update: 6/30/2001

**Emergency Diesel I.C. Engine Driving a Fire Pump**

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Positive crankcase ventilation [unless it voids the Underwriters Laboratories (UL) certification]	Catalytic Oxidation	
SOx	Low-sulfur diesel fuel (500 ppmw sulfur or less) or Very Low-sulfur diesel fuel (15 ppmw sulfur or less), where available.		
PM10	0.1 grams/bhp-hr (if TBACT is triggered) (corrected 7/16/01) 0.4 grams/bhp-hr (if TBACT is not triggered)		
NOx	Certified NOx emissions of 6.9 g/bhp-hr or less		
CO		Oxidation Catalyst	

1. Any engine model included in the ARB or EPA diesel engine certification lists and identified as having a PM10 emission rate of 0.149 grams/bhp-hr or less, based on ISO 8178 test procedure, shall be deemed to meet the 0.1 grams/bhp-hr requirement.

2. A site-specific Health Risk Analysis is used to determine if TBACT is triggered. (Clarification added 05/07/01)

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**

## Top Down BACT Analysis for the Emergency IC Engine(s)

Oxides of nitrogen (NO<sub>x</sub>) are generated from the high temperature combustion of the diesel fuel. A majority of the NO<sub>x</sub> emissions are formed from the high temperature reaction of nitrogen and oxygen in the inlet air. The rest of the NO<sub>x</sub> emissions are formed from the reaction of fuel-bound nitrogen with oxygen in the inlet air.

### 1. BACT Analysis for NO<sub>x</sub> Emissions:

#### a. Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse guideline 3.1.4, 3 quarter 20014, identifies achieved in practice BACT for NO<sub>x</sub> emissions from emergency diesel IC engines powering a firewater pump as follows:

- 1) Certified emissions of 6.9 g-NO<sub>x</sub>/bhp-hr or less

No technologically feasible alternatives or control alternatives identified as alternate basic equipment for this class and category of source are listed.

#### b. Step 2 - Eliminate technologically infeasible options

There are no technologically infeasible options to eliminate from step 1.

#### c. Step 3 - Rank remaining options by control effectiveness

No ranking needs to be done because the applicant has proposed the achieved in practice option.

#### d. Step 4 - Cost Effectiveness Analysis

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

#### e. Step 5 - Select BACT

BACT for NO<sub>x</sub> emissions from this emergency diesel IC engine powering a firewater pump is having certified emissions of 6.9 g-NO<sub>x</sub>/bhp-hr or less. The applicant has proposed to install a 175 bhp emergency diesel IC engine powering a firewater pump with certified emissions of 6.9 g-NO<sub>x</sub>/bhp-hr or less; therefore BACT for NO<sub>x</sub> emissions is satisfied.

## **BACT Analysis for VOC Emissions:**

### **5. BACT Analysis for VOC Emissions:**

Volatile organic compounds (VOC) are emitted from the crankcase of the engine as a result of piston ring blow-by.

#### **a. Step 1 - Identify all control technologies**

The SJVUAPCD BACT Clearinghouse guideline 3.1.4, 3rd quarter 2014, identifies achieved in practice BACT for VOC emissions from emergency diesel IC engines powering a firewater pump as follows:

- 1) Positive crankcase ventilation (unless it voids the Underwriters Laboratories (UL) certification)

In addition, the SJVUAPCD BACT Clearinghouse guideline 3.1.4, 3<sup>rd</sup> quarter 2014, identifies technologically feasible BACT for VOC emissions from emergency diesel IC engines powering a firewater pump as follows:

- 1) Catalytic oxidation

No control alternatives identified as alternate basic equipment for this class and category of source are listed.

#### **b. Step 2 - Eliminate technologically infeasible options**

There are no technologically infeasible options to eliminate from step 1.

#### **c. Step 3 - Rank remaining options by control effectiveness**

- 1) Catalytic oxidation
- 2) Positive crankcase ventilation (unless it voids the Underwriters Laboratories (UL) certification)

#### **d. 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.

However, this engine has been UL Certified, and the UL certification does not include a catalytic oxidation system or a positive crankcase ventilation system, and the addition of a catalytic oxidation system or a positive crankcase ventilation system would void the UL certification, which is required for firewater pump engines. Therefore, both the catalytic

oxidation system and the positive crankcase ventilation system options will not be required.

**e. Step 5 - Select BACT**

BACT for VOC emissions from this emergency diesel IC engine powering a firewater pump is having no control technology for VOC emissions. The applicant has proposed to install a 175 bhp emergency diesel IC engine powering a firewater pump with no control technology for VOC emissions; therefore BACT for VOC emissions is satisfied.

## Appendix B HRA Summary

## San Joaquin Valley Air Pollution Control District Risk Management Review

To: Steve Davidson, AQE - Permit Services  
 From: Kou Thao, AQS - Permit Services  
 Date: September 16, 2014  
 Facility Name: Saputo Cheese Usa Inc  
 Location: 800 E Paige Ave, Tulare, CA  
 Application #(s): S-1203-24  
 Project #: S-1143491

### A. RMR SUMMARY

RMR Summary			
Categories	Diesel-Fired IC Engine (Unit 24)	Project Totals	Facility Totals
Prioritization Score	N/A <sup>1</sup>	N/A <sup>1</sup>	>1.0
Acute Hazard Index	N/A <sup>2</sup>	N/A <sup>2</sup>	N/A <sup>2</sup>
Chronic Hazard Index	N/A <sup>2</sup>	N/A <sup>2</sup>	N/A <sup>2</sup>
Maximum Individual Cancer Risk (10 <sup>-6</sup> )	0.13	0.13	1.84
T-BACT Required?	No		
Special Permit Conditions?	Yes		

- 1 Prioritization for this unit was not conducted since it has been determined that all diesel-fired IC engines will result in a prioritization score greater than 1.0.
- 2 Acute and Chronic Hazard Indices were not calculated since there is no risk factor, or the risk factor is so low that the risk has been determined to be insignificant for this type of unit.

### Proposed Permit Conditions

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

#### Unit # 24

1. The PM10 emissions rate shall not exceed **0.09** g/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
3. {3488} This engine shall be operated only for maintenance, testing, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and

Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115] N

## B. RMR REPORT

### I. Project Description

Technical Services received a request on September 22, 2014, to perform a Risk Management Review for a proposed installation of a 175 hp diesel-fired emergency IC engine powering an electrical generator.

### II. Analysis

Technical Services performed a screening level health risk assessment using the District developed DICE database.

The following parameters were used for the review:

<b>Analysis Parameters Unit 24</b>			
<b>Source Type</b>	Point	<b>Location Type</b>	Rural
<b>BHP</b>	175	<b>PM<sub>10</sub> g/hp-hr</b>	0.09
<b>Closest Receptor (m)</b>	152	<b>Quad</b>	Quad 2
<b>Max Hours per Year</b>	26	<b>Type of Receptor</b>	Resident

### III. Conclusion

The cancer risk associated with the operation of the proposed diesel IC engine is less than 1.0 in a million. In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT) for PM10.

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

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

## Appendix C QNEC Calculations

### 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 shall be calculated as follows:

QNEC = PE2 - BE, where:

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

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, PE2<sub>quarterly</sub> and BE<sub>quarterly</sub> can be calculated as follows:

Quarterly Post Project Emissions		
Pollutant	PE2 Total (lb/yr)	Quarterly PE2 (lb/qtr)
NO <sub>x</sub>	48	12.0
SO <sub>x</sub>	0	0.0
PM <sub>10</sub>	2	0.5
CO	25	6.3
VOC	6	1.5

$$\begin{aligned}
 BE_{\text{quarterly}} &= BE_{\text{annual}} \div 4 \text{ quarters/year} \\
 &= 0 \text{ lb/year} \div 4 \text{ qtr/year} \\
 &= 0 \text{ lb/qtr (for all criteria pollutants)}
 \end{aligned}$$

QNEC			
Pollutant	Quarterly PE2 (lb/qtr)	Quarterly BE (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	12.0	0	12.0
SO <sub>x</sub>	0.0	0	0.0
PM <sub>10</sub>	0.5	0	0.5
CO	6.3	0	6.3
VOC	1.5	0	1.5

# Appendix D

## Draft ATC

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** S-1203-24-0

**LEGAL OWNER OR OPERATOR:** SAPUTO CHEESE USA INC  
**MAILING ADDRESS:** 800 E PAIGE AVE  
TULARE, CA 93274

**LOCATION:** 800 E PAIGE AVE  
TULARE, CA 93274

**EQUIPMENT DESCRIPTION:**

175 BHP (INTERMITTENT) JOHN DEER MODEL CLARKE JU6H-UFADMG TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE WITH A PARTICULATE FILTER POWERING A FIREWATER PUMP

**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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
6. 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
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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-1203-24-0 : Sep 24 2014 10:17AM - DAVIDSOS : Joint Inspection NOT Required

8. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: 2.5 g-NO<sub>x</sub>/bhp-hr, 1.3 g-CO/bhp-hr, or 0.3 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. Emissions from this IC engine shall not exceed 0.09 g-PM<sub>10</sub>/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
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, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
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. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

DRAFT

# Appendix E

## Title V Compliance Certification Form

RECEIVED  
AUG 25 2014  
SJVAPCD  
Southern Region

San Joaquin Valley  
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

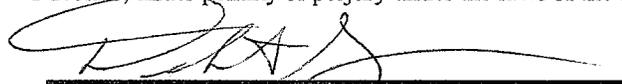
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: Saputo Cheese USA Inc.	FACILITY ID: S - 1203
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: Saputo Cheese USA Inc.	
3. Agent to the Owner: Not Applicable	

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

8-22-2014  
\_\_\_\_\_  
Date

Debra A. Guzman

\_\_\_\_\_  
Name of Responsible Official (please print)

Director of Environmental Affairs SCUSA & SDF

\_\_\_\_\_  
Title of Responsible Official (please print)