



**JUN 03 2015**

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

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # S-377  
Project # S-1144292**

Dear Mr. Lee:

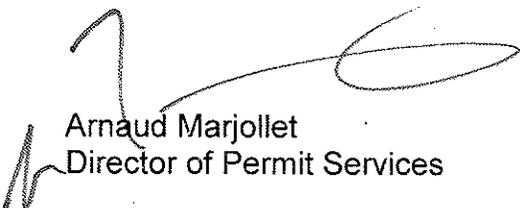
Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project consists of the correction of the equipment description for permit unit S-377-40 to include three previously authorized 2.5 MMBtu/hr dryers, and to remove reference to two 1.2 MMBtu/hr dryers, salt removal shaker, and filter socks; and various other language modifications to clarify and simplify the equipment description.

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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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

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Executive Director/Air Pollution Control Officer

# San Joaquin Valley Air Pollution Control District

## Authority to Construct Application Review

### Equipment Description Corrections/Clarifications

Facility Name: Paramount Farms Inc. Date: May 28, 2015  
Mailing Address: 13646 Highway 33 Engineer: Jonah Aiyabei  
Lost Hills, CA 93249 Lead Engineer: Joven Refuerzo  
Contact Person: Daniel Lee  
Telephone: (661) 797-6505  
Application #(s): S-377-40-15  
Project #: 1144292  
Deemed Complete: November 24, 2014

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#### I. Proposal

Paramount Farms Inc. (PFI) has requested that the equipment description for permit unit S-377-40 be corrected to include three 2.5 MMBtu/hr dryers that were authorized in 2013 through ATC S-377-40-11 (project #S-1130510). The three dryers were installed and are included in the current PTO equipment description (S-377-40-11, see copy in Appendix B), but were erroneously omitted from the equipment description used in the most recent ATC (S-377-40-14, see copy in Appendix C).

In addition, PFI has requested that the equipment description be corrected to remove reference to the following components: two 1.2 MMBtu/hr dryers, salt removal shaker associated with the Proctor Schwartz dryer, and filter socks that served equipment that has been removed per FDA requirements. The applicant has also requested various other language modifications to clarify and simplify the equipment description.

The modifications requested are in reference to ATC S-377-40-14, which was issued with Certificate of Conformity (COC) and will be implemented prior to the ATC resulting from the current application. In other words, the applicant considers ATC 40-14 to be the de facto current PTO, and is requesting these modifications to the equipment description and associated permit conditions on 40-14.

PFI received their Title V Permit on 8/31/01. This proposed modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a 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 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)

Rule 4201 Particulate Matter Concentration (12/17/92)  
Rule 4301 Fuel Burning Equipment (12/17/92) does not apply to dryers  
which utilize direct heat transfer (products of combustion contact  
material being dried)  
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 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 to this project.

### IV. Process Description

The pre-processing operation (S-377-10) may receive almonds from various hulling and shelling operations and passes them through a series of sizing and grading equipment. This equipment sorts the almonds by size and color into storage bins for further processing.

The sorted and cleaned almonds from pre-processing will be conveyed directly to a tank farm in building A1. From there the almonds are conveyed to either the pasteurization process or to flavoring and drying.

The almond processing and packaging operation (S-377-40) completes the sorting process and routes the nuts through various process units (blanchers, slicer/dicers, etc.) for preparation and packaging as required by the end user.

After flavoring and/or pasteurization the almonds are routed to a second tank farm and then to one of four packaging lines.

Whole or sliced nuts that have passed through a flavor coating operation (which is a wet process) to be dried are fed to the unit by a conveyor. The nuts are then conveyed through the heat zones of the dryer, the cooling zones, and then back into storage bins for packaging. The operating parameters of the unit including conveyor speeds, temperatures in the heat zones, and air flow which are all adjusted as needed to obtain the consistency specified by Paramount's product criteria.

The blanching operations are served by cyclones. The almond skins are subjected to water on the order of 195°F in the scalding. The hot water breaks down the almond glue which holds the skin on the almond. The wet skins are then vacuumed away, removed from the air stream by cyclones, and sold as cattle feed. This wet process is not expected to yield any PM<sub>10</sub> emissions and the cyclones are not considered to be air pollution control devices. The cyclones allow for the easy packaging of almond skins.

## V. Equipment Listing

### Pre-Project Equipment Description (based on implementation of ATC S-377-40-14):

S-377-40-14: 25.84 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION IN BUILDING #48 INCLUDING: SORTING EQUIPMENT, MOISTURIZING LINE, PACKAGING EQUIPMENT, ONE BLANCHING LINE, BINS, TANKS, CONVEYORS, ELEVATORS AND ASSORTED HARDWARE, WITH ONE SLIVER LINE AND ONE SLICER LINE EACH WITH A 32-10,000 BTU/HR BURNER PLASTICIZER AND ONE EACH 1.2 MMBTU/HR DRYER, AND ONE ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES - THE FIRST WITH A 3-STAGE PROCTOR SCHWARTZ ROASTER IN BUILDING #50 WITH TWO 1.6 MMBTU/HR NATURAL GAS FIRED BURNERS VENTED TO TWO CYCLONE ASSEMBLIES, SALT REMOVAL SHAKER, SURGE HOPPER, BUCKET ELEVATOR VENTED TO SOCK FILTERS AND ADDITIONAL CONVEYING EQUIPMENT, THE SECOND WITH AN AEROGlide MODEL C1 120-65 RGC NATURAL GAS FIRED ROASTER WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE, THE THIRD WITH A 4 MMBTU/HR NUT DRYER, BIN DUMPERS, BRINE TANK, MIX TANKS, SLURRY KETTLES, SEASONING SKIDS, OSCILLATING FEEDERS AND ASSOCIATED CONVEYING EQUIPMENT, TWO FLAVORING LINES EACH WITH A THREE STAGE 4.4 MM BTU/HR CPM WOLVERINE/PROCTOR NATURAL GAS FIRED DRYER COOLER VENTED TO A FABRIC COLLECTOR, CONVEYORS, ELEVATORS, AND STORAGE BINS

### Proposed Modifications:

The applicant has requested the following modifications:

- Add three 2.5 MMBTU/HR dryers and associated permit conditions from ATC S-377-40-11
- Remove 1.2 MMBTU/HR dryers and associated permit conditions
- Modify/clarify the equipment description as follows:
  - Remove references to "IN BUILDING #48" and "IN BUILDING 50"
  - Clarify that the sliver/slicer is only one line
  - Correct "ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES" to "ALMOND FLAVORING OPERATION CONSISTING OF FIVE LINES"
  - Remove references to "SALT REMOVAL SHAKER" and "FILTER SOCKS" associated with the Proctor Schwartz dryer
  - Specify that the 4 MMBtu/hr nut dryer is vented to a cyclone
  - Replace all miscellaneous equipment (bins, tanks, kettles, skids, feeders, conveyors, elevators, etc.) with "ASSOCIATED STORAGE, CONVEYANCE, AND HARDWARE"

Consistent with the current District practice, the equipment description will be simplified to include only components that are directly associated with emissions. This will address most of

the equipment description clarifications requested by the applicant. The proposed corrected/clarified and simplified equipment description is as shown below.

Proposed Equipment Description:

27.42 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION INCLUDING: THREE 2.5 MMBTU/HR INCUS DRYERS; THIRTY-TWO 10,000 BTU/HR PLASTICIZER BURNERS; ONE 3-STAGE PROCTOR SCHWARTZ ROASTER WITH TWO 1.6 MMBTU/HR BURNERS VENTED TO TWO CYCLONE ASSEMBLIES; ONE AEROGLIDE (#2) MODEL C1 120-65 RGC ROASTER WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE; ONE 4 MMBTU/HR AEROGLIDE (#3) NUT DRYER VENTED TO A CYCLONE; AND TWO 3-STAGE 4.4 MMBTU/HR CPM WOLVERINE/PROCTOR DRYER COOLERS VENTED TO FABRIC COLLECTORS

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

The only portion of almond finishing/flavoring operation equipment that is assessed emissions is the combustion equipment. This type of unit is fired on commercial natural gas. The small burners used in these units are thermostatically controlled to maintain drying chamber temperature usually in the 170 deg. F to 230 deg. F range with large amounts of excess air. This relatively cool chamber temperature is achieved with a cool burner temperature, which inherently produces less NOx than other types of dryers

The proposed equipment is expected to produce abraded pieces of nut, skin and nut >10 microns. The air flow from the proposed dryers will be routed to fabric collectors to collect this material for sale and to prevent a vector for insects and rodents. Therefore, the proposed fabric collectors are not considered as air pollution control devices.

## **VII. General Calculations**

### **A. Assumptions**

- The facility operates full time
- Units will only be fired PUC regulated natural gas
- PM<sub>10</sub> emissions from the proposed equipment are negligible (District assumption based upon prior experience with similar operations)
- Heating value of natural gas is 1,000 MMBtu/MMscf, District practice
- F-factor for natural gas, corrected to 68 °F, is 8,578 dscf/MMBtu
- The proposed removal of two 1.2 MMBtu/hr burners will not change total fuel usage
- The fuel usage rates for the different emissions units is as summarized in the following table:

Fuel Usage Summary		
Equipment	Daily Usage (MMscf/day)	Annual Usage (MMscf/yr)
Plasticizer burners (32 @ 10,000 btu/hr)	0.1035	10
Three Incus dryers @ 2.5 MMBtu/hr	0.18	56.31
Proctor Schwartz roaster (2 x 1.6 MMBtu/hr); Aeroglide (#2) roaster (2 x 1.8 MMBtu/hr)	0.1632	37.15
Two Wolverine/Proctor dryers @ 4.4 MMBtu/hr	0.21	76.65
One 4.0 MMBtu/hr Aeroglide (#3) nut dryer	0.096	30

### B. Emission Factors

The emission factors, based on the current ATC/PTO conditions, are summarized in the following table for all the emissions units:

Emission Factors					
Emissions unit	NOx (lb/MMscf)	SOx (lb/MMscf)	PM10 (lb/MMscf)	CO (lb/MMscf)	VOC (lb/MMscf)
Plasticizer burners	44.0	2.9	5.0	8.6	5.8
Incus dryer burners	10.9	2.9	2.8	147.8	3.8
Proctor Schwartz, Aeroglide (#2), & CPM Wolverine/Proctor burners	36.0	2.9	7.6	21.0	5.5
Aeroglide (#3) burner	83.2	2.9	2.8	21.0	3.8

### C. Calculations

#### 1. Pre-Project Potential to Emit (PE1)

The potential to emit is calculated as shown, and summarized in the tables below:

Daily PE = EF (lb/MMscf) x fuel usage (MMscf/day):

Daily PE1					
Emissions unit	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	CO (lb/day)	VOC (lb/day)
Plasticizer burners	4.6	0.3	0.5	0.9	0.6
Three Incus dryers	2.0	0.5	0.5	26.6	0.7
Proctor Schwartz roaster & Aeroglide #2 roaster	5.9	0.5	1.2	3.4	0.9

Daily PE1					
Emissions unit	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	CO (lb/day)	VOC (lb/day)
Two Wolverine/Proctor dryers	7.6	0.6	1.6	4.4	1.2
Aeroglidge #3 nut dryer	8.0	0.3	0.3	2.0	0.4
<b>Total</b>	<b>28.1</b>	<b>2.2</b>	<b>4.1</b>	<b>37.3</b>	<b>3.8</b>

Annual PE = EF (lb/MMscf) x fuel usage (MMscf/yr):

Annual PE1					
Emissions unit	NOx (lb/yr)	SOx (lb/yr)	PM10 (lb/yr)	CO (lb/yr)	VOC (lb/yr)
Plasticizer burners	440	29	50	86	58
Three Incus dryers	614	160	158	8,323	214
Proctor Schwartz roaster & Aeroglidge #2 roaster	1,337	106	282	780	204
Two Wolverine/Proctor dryers	2,759	218	583	1,610	422
Aeroglidge #3 nut dryer	2,496	86	84	630	114
<b>Total</b>	<b>7,646</b>	<b>599</b>	<b>1,157</b>	<b>11,429</b>	<b>1,012</b>

## 2. Post Project Potential to Emit (PE2)

Since this project does not result in any change in emissions, PE2 = PE1.

## 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.

The SSPE1 for this facility is as summarized in the following table:

SSPE1 (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-377-3-25	25,376	869	1,569	6,405	1,159
S-377-9-6	0	0	0	0	402
S-377-19-29	32,448	1,112	5,650	15,501	1,482
S-377-21-15	13,728	470	413	3,465	627
S-377-34-6	1,472	524	920	6,807	515
S-377-35-4	328	0	1	270	2

SSPE1 (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-377-37-4	1,800	18	24	604	54
S-377-39-5	499	17	30	126	35
S-377-40-14	7,646	599	1,157	11,429	1,012
S-377-41-3	0	0	0	0	0
S-377-43-2	0	0	0	0	1,278
S-377-44-2	0	0	0	0	1,278
S-377-45-2	0	0	0	0	1,278
S-377-46-2	0	0	0	0	1,278
S-377-47-6	832	29	28	210	39
S-377-49-3	0	0	376	0	1,539
S-377-50-3	13,728	470	2,652	3,465	627
S-377-52-0	0	0	5,621	0	0
S-377-54-1	182	0	4	27	7
S-377-55-0	0	0	0	0	4,091
S-377-56-0	2	3	1	38	3
<b>SSPE1</b>	<b>98,041</b>	<b>4,111</b>	<b>18,446</b>	<b>48,347</b>	<b>16,706</b>

#### 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.

Since the current project does not result in any change in emissions, SSPE2 = SSPE1.

#### 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 <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	VOC
SSPE1	98,041	4,111	18,446	18,446	48,347	16,706

Rule 2201 Major Source Determination (lb/year)						
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	VOC
SSPE2	98,041	4,111	18,446	18,446	48,347	16,706
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

This source is an existing Major Source for NO<sub>x</sub> emissions and will remain a Major Source for NO<sub>x</sub>. No change in other pollutants are proposed or expected 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)(i). Therefore the following PSD Major Source thresholds are applicable:

PSD Major Source Determination (tons/year)						
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Estimated Facility PE before Project Increase	49.0	8.4	2.1	24.2	9.2	9.2
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.

BE NO<sub>x</sub>:

Fully Offset Emissions Units, located at a Major Source

Offsets have been provided for the entire stationary source's potential to emit in excess of the offset trigger level. Therefore, pursuant to District Rule 2201, these emissions units are considered as fully offset, and BE = PE1 for NO<sub>x</sub> emissions.

BE SO<sub>x</sub>, PM10, CO and VOC:

Units Located at a Non-Major Source

As shown in Section VII.C.5 above, the facility is not a major source for SO<sub>x</sub>, PM10, CO and VOC emissions, hence BE = PE1 for SO<sub>x</sub>, PM10, CO and VOC emissions.

**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>	7,646	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 increase is compared to the Federal Major Modification Threshold 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

\*If there is any emission increases in NO<sub>x</sub> or VOC, this project is a Federal Major Modification and no further analysis is required.

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 pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- 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.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Total PE from New and Modified Units	3.8	0.5	0.3	5.7	0.6	0.6
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

As shown in the preceding table, 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. Since this project did not result in any change in emissions, QNEC = 0 lb/qtr for all pollutants.

## **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. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions\*:

- 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.

\*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

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

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

##### **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<sub>x</sub> emissions. Therefore BACT is not triggered for any pollutant.

**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 <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE2	98,041	4,111	18,446	48,347	16,706
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	No	No	No

**2. Quantity of Offsets Required**

As seen above, the facility is an existing Major Source for NO<sub>x</sub> and the SSPE2 is greater than the offset thresholds. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for NO<sub>x</sub> is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

$$\text{Offsets Required (lb/year)} = (\Sigma[\text{PE2} - \text{BE}] + \text{ICCE}) \times \text{DOR, for all new or modified emissions units in the project,}$$

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

As discussed in Section VII.C.6 above, the BE for the units in this project is equal to the PE1.

Also, there are no increases in cargo carrier emissions. Therefore offsets can be determined as follows:

$$\text{Offsets Required (lb/year)} = ([\text{PE2} - \text{BE}] + \text{ICCE}) \times \text{DOR}$$

PE2 (NO<sub>x</sub>) = 7,646 lb/year  
 BE (NO<sub>x</sub>) = 7,646 lb/year  
 ICCE = 0 lb/year

$$\begin{aligned} \text{Offsets Required (lb/year)} &= ([7,646 - 7,646] + 0) \times \text{DOR} \\ &= 0 \text{ lb NO}_x\text{/year} \end{aligned}$$

As demonstrated in the calculation above, the amount of offsets is zero. Therefore, offsets will not be required for this project.

### 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>	98,041	98,041	20,000 lb/year	No
SO <sub>x</sub>	4,111	4,111	54,750 lb/year	No

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
PM <sub>10</sub>	18,446	18,446	29,200 lb/year	No
CO	48,347	48,347	200,000 lb/year	No
VOC	16,706	16,706	20,000 lb/year	No

As shown in the preceding table, 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	SSPE1 (lb/year)	SSPE2 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO <sub>x</sub>	98,041	98,041	0	20,000 lb/year	No
SO <sub>x</sub>	4,111	4,111	0	20,000 lb/year	No
PM <sub>10</sub>	18,446	18,446	0	20,000 lb/year	No
CO	48,347	48,347	0	20,000 lb/year	No
VOC	16,706	16,706	0	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 Emission Limits (DELs)**

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.

**Proposed Rule 2201 (DEL) Conditions:**

- Emissions from the slicer/sliver line plasticizer burners shall not exceed any of the following limits: 44.0 lb-NO<sub>x</sub>/MMscf, 2.85 lb-SO<sub>x</sub>/MMscf, 5.0 lb-PM<sub>10</sub>/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District Rule 2201]
- The slicer/sliver line plasticizer burners' natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District Rule 2201]
- Emissions from the Proctor Schwartz, Aeroglide (#2), and CPM Wolverine/Proctor burners shall not exceed any of the following limits: 36.0 lb-NO<sub>x</sub>/MMscf, 2.85 lb-SO<sub>x</sub>/MMscf, 7.6 lb-PM<sub>10</sub>/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201]
- The Proctor Schwartz and Aeroglide (#2) roasters' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District Rule 2201]
- CPM Wolverine/Proctor dryers' combined total natural gas usage shall not exceed 0.21 MMscf/day. [District Rule 2201]
- Emission rate per MMscf gas burned from the 4.0 MMBtu/hr Aeroglide (#3) nut dryer shall not exceed any of the following: PM<sub>10</sub>: 2.8 lb/MMscf, SO<sub>x</sub> as (SO<sub>2</sub>): 2.85 lb/MMscf, NO<sub>x</sub> (as NO<sub>2</sub>): 83.2 lb/MMscf, VOC: 3.8 lb/MMscf, or CO: 21.0 lb/MMscf. [District Rule 2201]
- Natural gas combusted in the 4.0 MMBtu/hr Aeroglide (#3) nut dryer shall not exceed 0.096 MMscf/day nor 30 MMscf/yr. [District Rule 2201]
- Emissions from the Incus dryer burners shall not exceed any of the following limits: 10.9 lb-NO<sub>x</sub>/MMscf (as NO<sub>2</sub>), 2.85 lb-SO<sub>x</sub>/MMscf (as SO<sub>2</sub>), 2.8 lb-PM<sub>10</sub>/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201]
- The three 2.5 MMBtu/hr Incus dryers' combined natural gas usage shall not exceed 180,000 scf/day and 56.31 MMscf/year. [District Rule 2201]

**E. Compliance Assurance**

**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. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition(s) are listed on the permit to operate:

- Records of daily and annual natural gas consumption shall be maintained. [District Rules 1070, 2201 and 2520, 9.4]
- All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 2520, 9.4]

### 4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

### Rule 2410 Prevention of Significant Deterioration

As demonstrated in Section VII.C.9 above, this project is not subject to the requirements of Rule 2410.

### 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 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.

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

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to gas-fired nut drying, or nut flavoring operations.

#### **Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to gas-fired nut drying, or nut flavoring operations.

#### **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). All particulate removal equipment handles particles greater than 10 microns and all combustion equipment burns PUC quality natural gas; therefore visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility continued compliance 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.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

#### **Rule 4201 Particulate Matter Concentration**

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot. As this equipment is all fired on PUC quality natural gas compliance with this rule is expected. The following condition will appear on the ATC to ensure ongoing compliance:

- Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201] Y

### **Rule 4301 Fuel Burning Equipment**

This rule specifies maximum emission rates in lb/hr for SO<sub>2</sub>, NO<sub>2</sub>, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf.

This rule is applicable to fuel burning equipment that is defined in §3.1 of the rule as:

- Fuel Burning Equipment: 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 proposed dryers heat the nuts by direct heat transfer (the products of combustion come into contact with the process material); therefore, this rule is not applicable to this equipment.

### **Rule 4309 Dryer, Dehydrators, and Ovens**

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from dryers, dehydrators, and ovens. This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 MMBtu/hr or greater. Since the dryers being installed have a heat input rating less than 5.0 MMBtu they are not subject to the requirements of this rule. No further discussion is required.

### **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 SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes. The combustion equipment listed on these permits emit sulfur compounds and are limited to fire exclusively on PUC quality natural gas that will ensure compliance with this rule.

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

- All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rule 4801] Y

### **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.

### **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.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

## IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful EPA review period, issue ATC S-377-40-15 subject to the permit conditions on the attached draft ATC in Appendix C.

## X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-377-40-15	3020-02 H	>15 MMBtu/hr	\$1030

## Appendixes

- A: Draft ATC
- B: Current PTO
- C: ATC 40-14
- D: Compliance Certification

# **APPENDIX A**

## **Draft ATC**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**  
**DRAFT**

**PERMIT NO:** S-377-40-15

**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:** NE23 **TOWNSHIP:** 26S **RANGE:** 19E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ALMOND FINISHING AND PACKAGING OPERATION TO REVISE AND CLARIFY EQUIPMENT DESCRIPTION WITH POST PROJECT DESCRIPTION AS FOLLOWS: 27.42 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING AND PACKAGING OPERATION INCLUDING: THREE 2.5 MMBTU/HR INCUS DRYERS; THIRTY-TWO 10,000 BTU/HR PLASTICIZER BURNERS; ONE 3-STAGE PROCTOR SCHWARTZ ROASTER WITH TWO 1.6 MMBTU/HR BURNERS VENTED TO TWO CYCLONE ASSEMBLIES; ONE AEROGlide (#2) MODEL C1 120-65 RGC ROASTER WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE; ONE 4 MMBTU/HR AEROGlide (#3) NUT DRYER VENTED TO A CYCLONE; AND TWO 3-STAGE 4.4 MMBTU/HR CPM WOLVERINE/PROCTOR DRYER COOLERS VENTED TO FABRIC COLLECTORS

**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. Authority to Construct S-377-40-14 shall be implemented prior to the modifications authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Combustion equipment shall be equipped with operational non-resettable, totalizing fuel meters to demonstrate compliance with fuel consumption limits. [District Rule 2201] 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

**DRAFT**

Arnaud Marjollet, Director of Permit Services

S-377-40-15 : Apr 16 2015 5:08PM -- AUYABEJ : Joint Inspection NOT Required

5. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Emissions from the slicer/sliver line plasticizer burners shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 5.0 lb-PM10/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The slicer/sliver line plasticizer burners' natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the Proctor Schwartz, Aeroglidge (#2), and CPM Wolverine/Proctor burners shall not exceed any of the following limits: 36.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 7.6 lb-PM10/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The Proctor Schwartz and Aeroglidge (#2) roasters' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. CPM Wolverine/Proctor dryers' combined total natural gas usage shall not exceed 0.21 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emission rate per MMscf gas burned from the 4.0 MMBtu/hr Aeroglidge (#3) nut dryer shall not exceed any of the following: PM10: 2.8 lb/MMscf, SOx as (SO2): 2.85 lb/MMscf, NOx (as NO2): 83.2 lb/MMscf, VOC: 3.8 lb/MMscf, or CO: 21.0 lb/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Natural gas combusted in the 4.0 MMBtu/hr Aeroglidge (#3) nut dryer shall not exceed 0.096 MMscf/day nor 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emissions from the Incus dryer burners shall not exceed any of the following limits: 10.9 lb-NOX/MMscf (as NO2), 2.85 lb-SOX/MMscf (as SO2), 2.8 lb-PM10/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The three 2.5 MMBtu/hr Incus dryers' combined natural gas usage shall not exceed 180,000 scf/day and 56.31 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of daily and annual natural gas consumption shall be maintained. [District Rules 1070, 2201 and 2520, 9.4] Federally Enforceable Through Title V Permit
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 2520, 9.4] Federally Enforceable Through Title V Permit

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## **APPENDIX B**

### **Current PTO**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-377-40-11

**EXPIRATION DATE:** 10/31/2016

**SECTION:** NE23 **TOWNSHIP:** 26S **RANGE:** 19E

## **EQUIPMENT DESCRIPTION:**

18.62 MMBTU/HR (TOTAL) NATURAL GAS-FIRED ALMOND FINISHING, FLAVORING AND PACKAGING OPERATION INCLUDING: A 0.32 MMBTU/HR PLASTICIZER (WITH 32 BURNERS), THREE INCUS 2.5 MMBTU/HR DIRECT-FIRED DRYERS, 3.6 MMBTU/HR PROCTOR SCHWARTZ DRYER #2 (WITH TWO BURNERS), ONE 3.6 MMBTU/HR AEROGLIDE NUT DRYER #2 (WITH TWO BURNERS) VENTED TO A CYLONE, ONE 4.0 MMBTU/HR AEROGLIDE NUT DRYER #3 VENTED TO TWO CYCLONE ASSEMBLIES, AND ASSOCIATED PERMIT-EXEMPT EQUIPMENT

## **PERMIT UNIT REQUIREMENTS**

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Almond finishing and packaging operation shall be equipped with two operational non-resettable totalizing fuel meters: one serving the plasticizer and dryer serving the slicer/sliver line and one serving the two roasters, to show compliance with the fuel usage limits set forth in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Combustion equipment shall be equipped with operational non-resettable, totalizing fuel meters to demonstrate compliance with fuel consumption limits. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
5. Emissions from the Incus dryers shall not exceed any of the following limits: 10.9 lb-NOX/MMscf (as NO<sub>2</sub>), 2.85 lb-SOX/MMscf (as SO<sub>2</sub>), 2.8 lb-PM<sub>10</sub>/MMscf, 147.8 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions from the Proctor Schwartz #2 and Aeroglide #2 dryers shall not exceed any of the following limits: 36.0 lb-NOX/MMscf (as NO<sub>2</sub>), 2.85 lb-SOX/MMscf (as SO<sub>2</sub>), 7.6 lb-PM<sub>10</sub>/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Proctor Schwartz #2 and Aeroglide Dryer #2 natural gas usage shall not exceed 163,200 scf/day or 37.15 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from 4 MMBtu/hr Aeroglide #3 dryer shall not exceed any of the following limits: 83.2 lb-NOX/MMscf (as NO<sub>2</sub>), 2.85 lb-SOX/MMscf (as SO<sub>2</sub>), 2.8 lb-PM<sub>10</sub>/MMscf, 21.0 lb-CO/MMscf, or 3.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Aeroglide # 3 natural gas usage shall not exceed 96,000 scf/day or 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the plasticizer and dryer serving the slicer/sliver line shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOX/MMscf, 5.0 lb-PM<sub>10</sub>/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Slicer and sliver lines (two plasticizers and two dryers) natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [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.

Facility Name: PARAMOUNT FARMS

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

S-377-40-11 : Feb 17 2015 4:27PM - AIYABEU

12. Three 2.5 MMBtu Incus dryers' combined natural gas usage shall not exceed 180,000 scf/day and 56.31 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records of daily and annual natural gas consumption shall be maintained. [District Rule 1070 and 2520, 9.4] Federally Enforceable Through Title V Permit
14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4] Federally Enforceable Through Title V Permit

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

## **Appendix C**

**ATC 40-14**



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-377-40-14

ISSUANCE DATE: 10/14/2014

**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:** NE23 **TOWNSHIP:** 26S **RANGE:** 19E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ALMOND FINISHING AND PACKAGING OPERATION IN BUILDING #48 INCLUDING: SORTING EQUIPMENT, MOISTURIZING LINE, PACKAGING EQUIPMENT, TWO BLANCHING LINES, BINS, TANKS, CONVEYORS, ELEVATORS AND ASSORTED HARDWARE, WITH ONE SLIVER LINE AND ONE SLICER LINE EACH WITH A 32-10,000 BTU/HR BURNER PLASTICIZER AND ONE EACH 1.2 MMBTU/HR DRYER, AND ONE ALMOND FLAVORING OPERATION CONSISTING OF TWO LINES - THE FIRST WITH A 3-STAGE PROCTOR SCHWARTZ ROASTER IN BUILDING #50 WITH TWO 1.6 MMBTU/HR NATURAL GAS FIRED BURNERS VENTED TO TWO CYCLONE ASSEMBLIES; SALT REMOVAL SHAKER, SURGE HOPPER, BUCKET ELEVATOR VENTED TO SOCK FILTERS AND ADDITIONAL CONVEYING EQUIPMENT, THE SECOND WITH AN AEROGlide MODEL C1 120-65 RGC NATURAL GAS FIRED ROASTER WITH TWO 1.8 MMBTU/HR BURNERS VENTED TO A CYCLONE, THE THIRD WITH A 4 MMBTU/HR NUT DRYER, BIN DUMPERS, BRINE TANK, MIX TANKS, SLURRY KETTLES, SEASONING SKIDS, OSCILLATING FEEDERS AND ASSOCIATED CONVEYING EQUIPMENT: REMOVE ONE BLANCHING LINE AND ADD TWO FLAVORING LINES EACH WITH A THREE-STAGE 4.4 MMBTU/HR CPM WOLVERINE/PROCTOR NATURAL GAS-FIRED DRYER/COOLER VENTED TO A FABRIC COLLECTOR, WITH CONVEYORS, ELEVATORS AND STORAGE BINS

## 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

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 Marjoflet, Director of Permit Services

S-377-40-14; Oct 14 2014 1:57PM - TORIO : Joint Inspection NOT Required

3. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOX emission reduction credits for the following quantity of emissions: 1st quarter - 1,035 lb, 2nd quarter - 1,035 lb, 3rd quarter - 1,035 lb, and fourth quarter - 1,035 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number C-497-2 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This almond finishing and packaging operation shall be equipped with three operational non-resettable totalizing fuel meters: one serving the slicer and sliver lines (two plasticizers and two dryers), one serving the two roasters and one serving the flavoring line's two dryers, to show compliance with the fuel usage limits set forth in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All burners shall only be fired on PUC regulated natural gas. [Kern County Rule 407 and District Rules 2201 and 4801] 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
8. Emissions from the slicer and sliver lines (two plasticizers and two dryers) shall not exceed any of the following limits: 44.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 5.0 lb-PM10/MMscf, 8.6 lb-CO/MMscf, or 5.8 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The slicer and sliver lines (two plasticizers and two dryers) natural gas usage shall not exceed 103,500 scf/day and 10.0 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the Proctor Schwartz and Aeroglide dryers and CPM Wolverine/Proctor dryers shall not exceed any of the following limits: 36.0 lb-NOx/MMscf, 2.85 lb-SOx/MMscf, 7.6 lb-PM10/MMscf, 21.0 lb-CO/MMscf, or 5.5 lb-VOC/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The Proctor Schwartz and Aeroglide dryers' natural gas usage shall not exceed 163,200 scf/day and 37.15 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. CPM Wolverine/Proctor dryers' combined total natural gas usage shall not exceed 0.21 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emission rate per MMscf gas burned from the 4.0 MMBtu/hr Aeroglide nut dryer #3 shall not exceed any of the following: PM10: 2.8 lb/MMscf, SOx as (SO2): 2.85 lb/MMscf, NOx (as NO2): 83.2 lb/MMscf, VOC: 3.8 lb/MMscf, or CO: 21.0 lb/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Natural gas combusted in the 4.0 MMBtu/hr Aeroglide nut dryer (#3) shall not exceed 0.096 MMscf/day nor 30 MMscf/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of daily and annual natural gas consumption shall be maintained. [District Rules 1070, 2201 and 2520, 9.4] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 2520, 9.4] Federally Enforceable Through Title V Permit

## **APPENDIX D**

### **Compliance Certification**

RECEIVED  
NOV 18 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)**

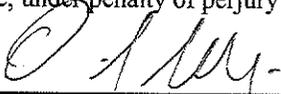
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE AMENDMENT  
 MINOR PERMIT MODIFICATION

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 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

November 3, 2014

\_\_\_\_\_  
Date

Dave Szeflin

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

Vice President of Operations

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