

October 6, 2021

Mr. Dana Horne
California Dairies, Inc.
475 S Tegner Rd
Turlock, CA 95380

Re: Notice of Preliminary Decision – Title V Permit Renewal
Facility Number: N-2149
Project Number: N-1212419

Dear Mr. Horne:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for California Dairies, Inc. at 475 S Tegner Rd, Turlock, California.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,



Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Laura Yannayon, EPA (w/enclosure) via EPS

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SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation California Dairies, Inc. N-2149

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TITLE V PERMIT RENEWAL EVALUATION

Milk Processing

Engineer: Gurpreet Brar
Date: October 6, 2021

Facility Number: N-2149
Facility Name: California Dairies, Inc.
Mailing Address: 475 S Tegner Rd
Turlock, CA 95380

Contact Name: Dana Horne
Title: Director of Compliance
Phone: (559) 233-5154

Responsible Official: Dana Horne
Title: Director of Compliance

Project # : N-1212419
Deemed Complete: July 29, 2021

I. PROPOSAL

California Dairies, Inc was issued its initial Title V permit on July 31, 2012. The Title V permit was previously renewed in 2016. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

The facility is located at 475 S Tegner Rd in Turlock, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated or Evaluated

- District Rule 2201, New and Modified Stationary Source Review Rule (amended April 21, 2011 – SIP version ⇒ amended August 15, 2019 – non-SIP version)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001– SIP version ⇒ amended August 15, 2019 – non-SIP version)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters - Phase 3 (amended October 16, 2008 – SIP version ⇒ amended December 17, 2020 – non-SIP version)
- District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr (amended October 16, 2008 – SIP version ⇒ last amended December 17, 2020 – non-SIP version)

- District Rule 4601, Architectural Coatings (amended December 17, 2009 – SIP version ⇒ amended April 16, 2020 – Non-SIP version)
- District Rule 4702, Internal Combustion Engines (Amended November 14, 2013 – SIP version ⇒ amended August 19, 2021 – Non-SIP version)
- 40 CFR Part 60, Subpart IIII, Standards of Performance for Compression Ignition Internal Combustion Engines (amended October 7, 2020)
- 40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources (amended September 14, 2016)
- 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (amended December 4, 2020)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM) (adopted October 22, 1997)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended May 6, 2021)
- 40 CFR Part 82, Subpart F, Recycling and Emission Reduction (amended May 6, 2021) 4

B. Rules Removed

There are no applicable rules that were removed since the previous Title V was issued.

C. Rules Added

There are no applicable rules that were added since the previous Title V was issued.

D. Rules Not Updated

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended December 18, 2014)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4304, Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters (adopted October 19, 1995)

- District Rule 4305, Boilers, Steam Generators, and Process Heaters - Phase 2 (amended August 21, 2003)
- District Rule 4309, Dryers, Dehydrators, and Ovens (amended December 15, 2005)
- District Rule 4351, Boilers, Steam Generators, and Process Heaters - Phase 1 (amended August 21, 2003)
- District Rule 4701, Internal Combustion Engines – Phase 1 (amended August 21, 2003)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 8011 (Fugitive Dust), General Requirements (amended August 19, 2004)
- District Rule 8021 (Fugitive Dust), Construction, Demolition, Excavation, and Extraction Activities (amended August 19, 2004)
- District Rule 8031 (Fugitive Dust), Bulk Materials (amended August 19, 2004)
- District Rule 8041 (Fugitive Dust), Carryout and Trackout (amended August 19, 2004)
- District Rule 8051 (Fugitive Dust), Open Area (amended August 19, 2004)
- District Rule 8061 (Fugitive Dust), Paved and Unpaved Roads (amended August 19, 2004)
- District Rule 8071 (Fugitive Dust), Unpaved Vehicle/Equipment Areas (amended September 16, 2004)
- 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (amended February 16, 2012)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (amended July 20, 2004)

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit."

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Added

None

B. Rules Updated

None

C. Rules Not Updated

- District Rule 4102, Nuisance (Amended December 17, 1992)
- Title 17 California Code of Regulations (CCR) Section 93115, Airborne Toxic Control Measure for Stationary Compression Ignition Engines (Effective May 19, 2011)

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the last TV renewal in 2016.

A. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this Title V permit was last renewed. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit. The updated requirements of this rule are therefore not applicable at this time.

B. District Rule 2520 - Federally Mandated Operating Permits

This rule has been amended since the issuance of the initial TV permit, but the last amended version of the rule is not SIP approved. Additionally, the amendments to this rule do not have any effect on current permit requirements. However, only greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

Greenhouse Gas Discussion

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40 CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

C. District Rule 4306 - Boilers, Steam Generators, and Process Heaters - Phase 3

This rule limits NOx and CO emissions from boilers, steam generators and process heaters rated greater than 5 MMBtu/hr. The facility has one 60.6 MMBtu/hr natural gas-fired boiler (permit unit N-2149-3) and one 60.7 MMBtu/hr natural gas-fired boiler (permit unit N-2149-4) that are subject to the requirements of this rule.

The units are in compliance with the current SIP version of the rule and will also comply with the emission limits of the last amended non-SIP approved version of the rule as summarized in the following table:

Category	Operated on Gaseous Fuel		Operated on Liquid Fuel	
	NOx Limit	CO Limit (ppmv)	NOx Limit	CO Limit (ppmv)
2. All other units with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour	7 ppmv or 0.0085 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400
3. Units with a rated heat input > 75 MMBtu/hour	5 ppmv or 0.0061 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400

Additionally, the amendments to this rule do not have any effect on the current permit requirements; therefore, no further discussion is necessary of this rule.

D. District Rule 4320 - Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr

This rule limits NO_x, CO, SO₂ and PM₁₀ emissions from boilers, steam generators and process heaters rated greater than 5 MMBtu/hr. The facility has one 60.6 MMBtu/hr natural gas-fired boiler (permit unit N-2149-3) and one 60.7 MMBtu/hr natural gas-fired boiler (permit unit N-2149-4) that are subject to the requirements of this rule.

The units are in compliance with the current SIP approved version of the rule. However, the last amended version of the rule, which is not SIP approved, requires a lower NO_x emission limit for this unit. The following table from the non-SIP version of the rule specifies the applicable NO_x emission limits, Emission Control Plan, Authority to Construct, and compliance deadlines:

Table 2: Tier 2 NO _x Emission Limits				
Category	NO _x Limit	Emission Control Plan	Authority to Construct	Compliance Deadline
B. Units with a total rated heat input > 20.0 MMBtu/hr, except for Categories C through E units				
1. Fire Tube Boilers with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour	2.5 ppmv or 0.003 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023
2. All other units with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour	2.5 ppmv or 0.003 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023
3. Units with a rated heat input > 75 MMBtu/hour	2.5 ppmv or 0.003 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023

Since the last amended version of the rule is not SIP approved and no compliance deadlines have passed, this version of the rule will not be discussed further in this evaluation. Since the units are currently in compliance with the current SIP version of the rule, no further discussion is necessary of this rule.

E. District Rule 4601 - Architectural Coatings

This rule limits the emissions of VOC's from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Tables 1 and 2 of Section 5.0 of the amended rule. This rule further specifies. This rule specifies architectural coatings storage, cleanup, and labeling requirements.

The rule was amended in April 16, 2020 but had not been SIP approved. The stringency analysis in Attachment D shows that the amended rule is as stringent as the SIP approved version of the rule that was adopted in December 17, 2009.

The following changes were included in the latest rule amendment that resulted in revising current permit requirements:

- The tables outlining the VOC content of different specialty coatings and colorants have been largely replaced with the Table 1 and Table 2 in Section 5.0.

The updated conditions 23, 24 and 25 on the draft facility-wide permit N-2149-0-4 will assure compliance with the requirements of this rule.

F. District Rule 4702 - Internal Combustion Engines

The purpose of this rule is to limit the emissions of nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), and sulfur oxides (SOx) from internal combustion engines. This rule applies to any internal combustion engine rated at 25 brake horsepower or greater. The permit unit N-2149-7 is in compliance with the current SIP approved version of the rule. However, the last amended version of the rule, which is not SIP approved, requires lowering NOx and VOC emissions for spark-ignited IC engines, clarifying definitions, and updating test methods. Also the Particulate Matter Emission Control Requirements were added to the rule as Section 5.8, and as such the purpose of the rule was amended to encompass the new requirements.

The engine under permit unit N-2149-7 is a compression-ignited emergency standby engine equipped with a nonresettable elapsed time meter. Therefore, the amended sections of this rule are not applicable to this engine. Because the amendments to District Rule 4702 do not affect the requirements for any permit unit at this site and no additional conditions are required, the changes will not be addressed further in this evaluation.

G. 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This subpart applies to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commence construction after July 11, 2005 where the stationary CI ICE are (1) manufactured after April 1, 2006 and are not fire pump engines, or manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

Permit unit N-2149-7 was installed prior to July 11, 2005 and is therefore not subject to this subpart.

H. 40 CFR 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources

Section 63.1193 states that Subpart JJJJJJ is applicable to owners and operators of an industrial, commercial, or institutional boiler that is located at, or is part of, an area source of Hazardous Air Pollutant (HAP) emissions.

Section 63.11195(e) states that gas-fired boilers are not subject to the requirements of this Subpart. The boilers at this facility under permit units N-2149-3 and N-2149-4 are fired only on PUC-quality natural gas; therefore, these are not subject to the requirements of this subpart, and no further discussion is required.

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

This subpart establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

This subpart is only applicable to the 2,220 bhp diesel-fired emergency standby IC engine (permit unit N-2149-7). The amendments to fuel and notification requirements and modifications to applicable general provisions of this subpart do not have any effect on current permit requirements and will therefore not be addressed further in this evaluation.

The following conditions on the draft renewed permit are a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #s
N-2149-7-4	1, 8, and 11 through 18

J. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

1. the unit must have an emission limit for the pollutant;
2. the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), SCR system, baghouses, and thermal/catalytic oxidizers; and
3. the unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (lb/year)
VOC	20,000
NO _x	20,000
CO	200,000
PM ₁₀	140,000
SO _x	140,000

Each permit unit at this facility was evaluated for compliance with CAM requirements during the previous Title V action for this facility. The requirements of this subpart have not been amended since the previous Title V action; however, to ensure continued compliance with the requirements of this subpart, compliance with CAM will be demonstrated in this Title V renewal.

a. *N-2149-1-5: POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7,500 SCFM*

This permit unit has emissions limits for PM₁₀ only. This permit unit may be subject to CAM for PM₁₀ since the unit has an emission limit for PM₁₀ and is equipped with add-on control for PM₁₀. The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

EF_{Controlled} = 0.0045 lb-PM₁₀/ton (current PTO limit)

CE = baghouse control efficiency; 99% (District assumption)

Throughput = 400,000 lb-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= [0.0045 \text{ lb-PM}_{10}/\text{ton} \times (400,000 \text{ lb/day} \div 2,000 \text{ lb/ton}) \times 365 \text{ day/year}] \div (1-0.99) \\ &= 32,850 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is not greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is not subject to CAM for PM₁₀.

b. *N-2149-2-9: 11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER*

This permit unit has emissions limits for NO_x, SO_x, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for NO_x, SO_x, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for PM₁₀ so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

- EF_{Controlled} = 0.348 lb-PM₁₀/ton (current PTO limit)
- CE = wet scrubber; 90% (District assumption)
- Throughput = 106.6 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= [0.348 \text{ lb-PM}_{10}/\text{ton} \times 106.6 \text{ ton/day} \times 365 \\ &\quad \text{day/year}] \div (1-0.90) \\ &= 135,403 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is not greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is not subject to CAM for PM₁₀.

- c. *N-2149-3-9: 60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM*

This permit unit has emissions limits for NO_x, SO_x, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for SO_x, PM₁₀, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for NO_x so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\begin{aligned} \text{Pre-control PE NO}_x &= (\text{EF}_{\text{Controlled}}, \text{ lb-NO}_x/\text{MMBtu} \times \text{Burner Rating,} \\ &\quad \text{MMBtu/hr} \times \text{Operation, hr/day} \times 365 \text{ day/year}) \\ &\quad \div (1-\text{CE}) \end{aligned}$$

To determine the control efficiency for FGR, the following emissions factors from AP-42, Table 1.4-1 (7/98) for boilers <100 MMBtu/hr will be used:

	NO _x Emission Factor (lb/10 ⁶ scf)
Uncontrolled	100
Controlled – low NO _x burners	50
Controlled – low NO _x burners/ FGR	32

The control efficiency of FGR is calculated as follows:

Reduction from adding FGR to a boiler with low NOx burner

$$100 \times [(50-32) \div 50] = 36\%$$

Pre-control PE

$$\begin{aligned} \text{Pre-control PE NOx} &= (0.0085 \text{ lb-NOx/MMBtu} \times 60.6 \text{ MMBtu/hr} \times \\ &\quad 24 \text{ hr/day} \times 365 \text{ day/year}) \div (1-0.36) \\ &= 7,050 \text{ lb-NOx/year} \end{aligned}$$

Since the pre-control PE for NOx for this permit unit is not greater than the major source threshold of 20,000 lb-NOx/year, this unit is not subject to CAM for NOx.

- d. *N-2149-4-9: 60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER*

This permit unit has emissions limits for NOx, SOx, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for SOx, PM₁₀, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for NOx so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\begin{aligned} \text{Pre-control PE NOx} &= (E_{\text{Controlled}}, \text{ lb-NOx/MMBtu} \times \text{Burner Rating,} \\ &\quad \text{MMBtu/hr} \times \text{Operation, hr/day} \times 365 \text{ day/year}) \\ &\quad \div (1-CE) \end{aligned}$$

As shown previously, the use of FGR results in 36% reduction in NOx emissions. Therefore, the pre-control PE for this unit is calculated as follows:

$$\begin{aligned} \text{Pre-control PE NOx} &= (0.0085 \text{ lb-NOx/MMBtu} \times 60.7 \text{ MMBtu/hr} \times \\ &\quad 24 \text{ hr/day} \times 365 \text{ day/year}) \div (1-0.36) \\ &= 7,062 \text{ lb-NOx/year} \end{aligned}$$

Since the pre-control PE for NO_x for this permit unit is not greater than the major source threshold of 20,000 lb-NO_x/year, this unit is not subject to CAM for NO_x.

- e. *N-2149-5-7: 31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS*

This permit unit has emissions limits for NO_x, SO_x, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for NO_x, SO_x, CO, or VOC; therefore, this unit cannot be subject to CAM for these pollutants.

This unit is equipped with an add-on control for PM₁₀ so it may be subject to CAM for this pollutant. The following calculation determines whether the pre-control PE for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

$$\begin{aligned} \text{EF}_{\text{Controlled}} &= 0.141 \text{ lb-PM}_{10}/\text{ton} \text{ (current PTO limit)} \\ \text{CE} &= \text{baghouses; } 99\% \text{ (District assumption)} \\ \text{Throughput} &= 228.0 \text{ ton-product/day (current PTO limit)} \end{aligned}$$

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= [0.141 \text{ lb-PM}_{10}/\text{ton} \times 228.0 \text{ ton/day} \times 365 \\ &\quad \text{day/year}] \div (1-0.99) \\ &= 1,173,402 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is subject to CAM for PM₁₀.

- Conditions 35 through 41 of the requirements for the draft renewed Title V operating permit ensure compliance with the requirements of this regulation.

f. N-2149-6-4: POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

This permit unit has emissions limits for PM₁₀ only. This permit unit may be subject to CAM for PM₁₀ since the unit has an emission limit for PM₁₀ and is equipped with add-on control for PM₁₀. The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

EF_{Controlled} = 0.0045 lb-PM₁₀/ton (current PTO limit)

CE = baghouse control efficiency; 99% (District assumption)

Throughput = 444.4 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.0045 \text{ lb-PM}_{10}/\text{ton} \times 444.4 \text{ ton/day} \times 365 \\ &\quad \text{day/year}) \div (1-0.99) \\ &= 72,993 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is not greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is not subject to CAM for PM₁₀.

g. N-2149-7-4: 2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

This permit unit has emissions limits for NO_x, PM₁₀, CO, and VOC. However, the unit does not have add-on control devices for these pollutants; therefore, this unit cannot be subject to CAM for these pollutants.

h. N-2149-8-3: DRY MILK BLENDING OPERATION CONSISTING OF TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY A 4,250 CFM DONALDSON MODEL 2DF12 DUST COLLECTOR

This permit unit has emissions limits for PM₁₀ only. This permit unit may be subject to CAM for PM₁₀ since the unit has an emission limit for PM₁₀ and is equipped with add-on control for PM₁₀.

The following calculation determines whether the pre-control potential to emit (PE) for this unit is greater than the major source threshold.

$$\text{Pre-control PE PM}_{10} = (\text{EF}_{\text{Controlled, lb-PM}_{10}/\text{ton}} \times \text{Throughput, ton/day} \times 365 \text{ day/year}) \div (1-\text{CE})$$

Where,

- $\text{EF}_{\text{Controlled}}$ = 0.00022 lb-PM₁₀/ton (current PTO limit)
- CE = dust collector control efficiency; 99% (District assumption)
- Throughput = 72.0 ton-product/day (current PTO limit)

$$\begin{aligned} \text{Pre-control PE PM}_{10} &= (0.00022 \text{ lb-PM}_{10}/\text{ton} \times 72.0 \text{ ton/day} \times 365 \\ &\quad \text{day/year}) \div (1-0.99) \\ &= 578 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the pre-control PE for PM₁₀ for this permit unit is not greater than the major source threshold of 140,000 lb-PM₁₀/year, this unit is not subject to CAM for PM₁₀.

K. 40 CFR Part 82 Subpart B - Servicing of Motor Vehicle Air Conditioners

Per §82.30(a) the purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Clean Air Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances (as that term is defined in 40 CFR 82.152).

Per §82.30(b) these regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this subpart did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation.

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Renewed Permit	Permit Condition
N-2149-0-4	28

L. 40 CFR Part 82 Subpart F - Recycling and Emissions Reductions

Per §82.150(a) the purpose of 40 CFR Part 82 Subpart F is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

Per §82.150(b) these regulations apply to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

The amendments to this subpart did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation.

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Renewed Permit	Permit Condition
N-2149-0-4	27

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant does not propose to use any model general permit templates.

B. Requirements not Addressed by Model General Permit Templates

The applicant is not requesting any permit shields.

C. Obsolete Permit Shields From Existing Permit Requirements

There were no obsolete permit shields listed in the existing permit requirements.

XI. California Environmental Quality Act

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

XII. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit

XIII. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Summary List of Facility Permits
- D. District Rule 4601 Stringency Analysis

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-2149-0-4

EXPIRATION DATE: 11/30/2021

FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/18/14). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. No person shall manufacture, blend, repackage, supply, markets, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 2 of District Rule 4601 (4/16/20), and shall comply with Table 1 and Table 2 effective on and after 1/1/22 of District Rule 4601 (4/16/20) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (4/16/20) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (4/16/20). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
40. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
41. On July 31, 2012 , the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin August 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-1-5

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7,500 SCFM

PERMIT UNIT REQUIREMENTS

1. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of product bagged shall not exceed 400,000.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
10. A daily log shall be maintained and shall include the total weight of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
13. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Stanislaus County Rule 107] Federally Enforceable Through Title V Permit
14. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] 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.

15. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-2-9

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS-FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER (PLANT 1)

PERMIT UNIT REQUIREMENTS

1. The dryer shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
2. The dryer shall be equipped with a totalizing fuel flow meter which measures the quantity of natural gas consumed per day (in cubic feet). [District Rule 2201] Federally Enforceable Through Title V Permit
3. The wet scrubber sprays and/or nozzles shall be maintained in optimum working order. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All ducting from the drying operations to the wet scrubber shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heat input to the dryer shall not exceed 207.0 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The heat input to the dryer shall not exceed 70,445 MMBtu/year, calculated on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of powdered milk produced shall not exceed 106.6 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The NO_x emissions due to the combustion of natural gas shall not exceed 3.5 ppmv @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CO emissions due to the combustion of natural gas shall not exceed 11.37 ppmv @ 19% O₂ (equivalent to 0.084 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The SO_x emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The PM₁₀ emissions from the drying operation shall not exceed 0.348 lb/ton of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The combined PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] 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.

16. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted using EPA Method 5, or CARB 501/501A or any other District and EPA approved test method. [District Rule 2201] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
21. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
23. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
27. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
28. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] 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.

29. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records which demonstrate the dryer is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
32. The permittee shall maintain a daily record, in MMBtu, of the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records on a 12-month rolling basis, in MMBtu, the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The permittee shall maintain a daily record, in pounds, of the quantity of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
36. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-3-9

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM (BOILER #1)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall maintain records of all equipment maintenance. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
4. The total PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] 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.

9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the combusted gas is provided from a PUC-regulated source. [District Rules 2520 and 4320] Federally Enforceable Through Title V Permit
12. Determination of total sulfur as hydrogen sulfide (H₂S) content shall be determined by EPA Method 11 or EPA Method 15, as appropriate. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
16. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. The owner or operator shall record and maintain records of the amount of fuel combusted during each operating day. [40 CFR 60.48c(g)(1)] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-4-9

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER (BOILER #2)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall maintain records of all equipment maintenance. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
4. The total PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] 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.

9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the combusted gas is provided from a PUC-regulated source. [District Rules 2520 and 4320] Federally Enforceable Through Title V Permit
12. Determination of total sulfur as hydrogen sulfide (H₂S) content shall be determined by EPA Method 11 or EPA Method 15, as appropriate. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
16. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. The owner or operator shall record and maintain records of the amount of fuel combusted during each operating day. [40 CFR 60.48c(g)(1)] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-5-7

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS-FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS (PLANT 2)

PERMIT UNIT REQUIREMENTS

1. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Each baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from each baghouse serving the drying operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting from the drying operations to the baghouses shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The dryer shall only be fired on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The quantity of powdered milk produced shall not exceed 228.0 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The NO_x emissions due to the combustion of natural gas shall not exceed 4.81 ppmv @ 19% O₂ (equivalent to 0.055 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The CO emissions due to the combustion of natural gas shall not exceed 8.26 ppmv @ 19% O₂ (equivalent to 0.061 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The SO_x emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The PM₁₀ emissions from the dryer baghouses shall not exceed 0.141 lb/ton of powdered milk processed. [District Rule 2201] 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.

15. The combined PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Differential operating pressure of each baghouse shall be monitored and recorded on each day that each baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
18. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
20. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
26. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
27. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records of the daily quantity of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of all maintenance of each baghouse, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
34. 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 Rules 1070 and 4309] Federally Enforceable Through Title V Permit
35. Each baghouse shall operate at all times with a minimum differential pressure of 0.0 inches water column and a maximum differential pressure of 8.5 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. During each day of operation, the permittee shall record the differential pressure of each baghouse and compare the readings with the permitted range. If the differential pressure of each baghouse falls outside the permitted range, the permittee shall take all necessary steps to return the differential pressure of each baghouse to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. For each baghouse, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
38. For each baghouse, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
39. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for each baghouse, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
40. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR Part 64] Federally Enforceable Through Title V Permit
41. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

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

San Joaquin Valley *Air Pollution Control District*

PERMIT UNIT: N-2149-6-4

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 5 inches water column. The gauge may read differential pressure of 0 inches water column after the baghouse service until sufficient loading of the filter media has occurred. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting from the bagging operation to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of product bagged shall not exceed 444.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The PM10 emission concentration shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of the daily quantity of powder milk bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of the combined daily quantity of PM10 emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The total PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] 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.

15. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
16. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-7-4

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6625] Federally Enforceable Through Title V Permit
2. 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]
3. 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
4. Emissions shall not exceed any of the following: 6.9 g-NOx/bhp-hr; 1.4 g-CO/bhp-hr; or 1.0 g-VOC/bhp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed 0.4 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 13 CCR 2423, and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
7. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
8. 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 21 hours per calendar year. [District Rules 2201 and 4702, and 40 CFR 63.6640 (f)(ii)] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
10. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), records of operational characteristics monitoring, and the sulfur content of the diesel fuel used. 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, 17 CCR 93115, and 40 CFR 63.6655(a)(2) and (a)(5)] Federally Enforceable Through Title V Permit
12. 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, 17 CCR 93115, and 40 CFR 63.6660] Federally Enforceable Through Title V Permit
13. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)] Federally Enforceable Through Title V Permit
14. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63.6585 and 63.6595 (a)] Federally Enforceable Through Title V Permit
15. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63.6603 and 63.6640 Table 2d, Row 4.a] Federally Enforceable Through Title V Permit
16. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603 and 63.6640 Table 2d, Row 4.b] Federally Enforceable Through Title V Permit
17. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603 and 63.6640 Table 2d, Row 4.c] Federally Enforceable Through Title V Permit
18. The permittee shall keep records of the maintenance conducted on the engine. [40 CFR 63.6655(e)] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2149-8-3

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

DRY MILK BLENDING OPERATION CONSISTING OF TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY A 4,250 CFM DONALDSON MODEL 2DF12 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The dust collector shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filters. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement filters numbering at least 10% of the total number of filters in the dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 12 inches water column. [District Rule 2201]
8. The quantity of dry milk processed shall not exceed 72.0 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.00022 pounds per ton of the dry milk processed. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain daily records of the quantity of dry milk processed, in tons, and shall keep the records on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
13. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
14. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] 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.

15. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

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ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley

Air Pollution Control District

FACILITY: N-2149-0-3

EXPIRATION DATE: 11/30/2021

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rules 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: CALIFORNIA DAIRIES, INC.
Location: 475 S TEGNER RD, TURLOCK, CA 95380
N-2149-0-3 : Sep 13 2021 10:55AM -- BRARG

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2; and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR Part 82, Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR Part 61, Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
40. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
41. On August 31, 2012, the initial Title V permit was issued. [District Rule 2520] Federally Enforceable Through Title V Permit
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin August 01 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley *Air Pollution Control District*

PERMIT UNIT: N-2149-1-4

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7,500 SCFM

PERMIT UNIT REQUIREMENTS

1. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting from the bagging operations to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of product bagged shall not exceed 400,000.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
10. A daily log shall be maintained and shall include the total weight of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
13. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201 and Stanislaus County Rule 107] Federally Enforceable Through Title V Permit
14. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] 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.

15. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2149-2-8

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER (PLANT 1)

PERMIT UNIT REQUIREMENTS

1. The dryer shall only be fired on PUC quality natural gas. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
2. The dryer shall be equipped with a totalizing fuel flow meter which measures the quantity of natural gas consumed per day (in cubic feet). [District Rule 2201] Federally Enforceable Through Title V Permit
3. The wet scrubber sprays and/or nozzles shall be maintained in optimum working order. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All ducting from the drying operations to the wet scrubber shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heat input to the dryer shall not exceed 207.0 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The heat input to the dryer shall not exceed 70,445 MMBtu/year, calculated on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of powdered milk produced shall not exceed 106.6 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The NO_x emissions due to the combustion of natural gas shall not exceed 3.5 ppmv @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CO emissions due to the combustion of natural gas shall not exceed 11.37 ppmv @ 19% O₂ (equivalent to 0.084 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The SO_x emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The PM₁₀ emissions from the drying operation shall not exceed 0.348 lb/ton of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The combined PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] 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.

16. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure PM10 emissions from the scrubber exhaust gas shall be conducted using EPA Method 5, or CARB 501/501A or any other District and EPA approved test method. [District Rule 2201] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
21. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
23. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
27. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
28. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] 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.

29. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records which demonstrate the dryer is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
32. The permittee shall maintain a daily record, in MMBtu, of the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records on a 12-month rolling basis, in MMBtu, the quantity of natural gas consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The permittee shall maintain a daily record, in pounds, of the quantity of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
36. 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 Rules 1070 and 4309] Federally Enforceable Through Title V Permit

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2149-3-8

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM (BOILER #1)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall maintain records of all equipment maintenance. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
4. The total PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] 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.

9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the combusted gas is provided from a PUC-regulated source. [District Rules 2520 and 4320] Federally Enforceable Through Title V Permit
12. Determination of total sulfur as hydrogen sulfide (H₂S) content shall be determined by EPA Method 11 or EPA Method 15, as appropriate. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
16. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. The owner or operator shall record and maintain records of the amount of fuel combusted during each operating day. [40 CFR 60.48c(g)(1)] Federally Enforceable Through Title V Permit

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2149-4-8

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER (BOILER #2)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall maintain records of all equipment maintenance. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
3. Emissions rates shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
4. The total PM₁₀ emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6, combined, shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer show that the emissions continue to exceed the allowable levels after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] 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.

9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the combusted gas is provided from a PUC-regulated source. [District Rules 2520 and 4320] Federally Enforceable Through Title V Permit
12. Determination of total sulfur as hydrogen sulfide (H₂S) content shall be determined by EPA Method 11 or EPA Method 15, as appropriate. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
16. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. The owner or operator shall record and maintain records of the amount of fuel combusted during each operating day. [40 CFR 60.48c(g)(1)] Federally Enforceable Through Title V Permit

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2149-5-6

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS (PLANT 2)

PERMIT UNIT REQUIREMENTS

1. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Each baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from each baghouse serving the drying operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting from the drying operations to the baghouses shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The dryer shall only be fired on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The quantity of powdered milk produced shall not exceed 228.0 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The NO_x emissions due to the combustion of natural gas shall not exceed 4.81 ppmv @ 19% O₂ (equivalent to 0.055 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The CO emissions due to the combustion of natural gas shall not exceed 8.26 ppmv @ 19% O₂ (equivalent to 0.061 lb/MMBtu). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The SO_x emissions due to the combustion of natural gas shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The PM₁₀ emissions from the dryer baghouses shall not exceed 0.141 lb/ton of powdered milk processed. [District Rule 2201] 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.

15. The combined PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Differential operating pressure of each baghouse shall be monitored and recorded on each day that each baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
18. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
20. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
26. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
27. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] 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.

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records of the daily quantity of powdered milk produced. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of the combined daily quantity of PM₁₀ emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of all maintenance of each baghouse, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
34. 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 Rules 1070 and 4309] Federally Enforceable Through Title V Permit
35. Each baghouse shall operate at all times with a minimum differential pressure of 0.0 inches water column and a maximum differential pressure of 8.5 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. During each day of operation, the permittee shall record the differential pressure of each baghouse and compare the readings with the permitted range. If the differential pressure of each baghouse falls outside the permitted range, the permittee shall take all necessary steps to return the differential pressure of each baghouse to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. For each baghouse, the permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
38. For each baghouse, the permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
39. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2) for each baghouse, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
40. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR Part 64] Federally Enforceable Through Title V Permit
41. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

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

San Joaquin Valley *Air Pollution Control District*

PERMIT UNIT: N-2149-6-3

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 5 inches water column. The gauge may read differential pressure of 0 inches water column after the baghouse service until sufficient loading of the filter media has occurred. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no visible emissions from the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting from the bagging operation to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The quantity of product bagged shall not exceed 444.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The PM10 emission concentration shall not exceed 0.0045 lb/ton of product bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of the daily quantity of powder milk bagged. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of the combined daily quantity of PM10 emitted by permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 and N-2149-6. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The total PM10 emissions from permit units N-2149-2, N-2149-3, N-2149-4, N-2149-5 & N-2149-6 shall not exceed 69.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] 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.

15. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
16. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2149-7-3

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 63.6625] Federally Enforceable Through Title V Permit
2. 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]
3. 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
4. Emissions shall not exceed any of the following: 6.9 g-NOx/bhp-hr; 1.4 g-CO/bhp-hr; or 1.0 g-VOC/bhp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed 0.4 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 13 CCR 2423, and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
7. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
8. 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 21 hours per calendar year. [District Rules 2201 and 4702, and 40 CFR 63.6640 (f)(ii)] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
10. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), records of operational characteristics monitoring, and the sulfur content of the diesel fuel used. 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, 17 CCR 93115, and 40 CFR 63.6655(a)(2) and (a)(5)] Federally Enforceable Through Title V Permit
12. 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, 17 CCR 93115, and 40 CFR 63.6660] Federally Enforceable Through Title V Permit
13. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)] Federally Enforceable Through Title V Permit
14. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63.6585/63.6595 (a)] Federally Enforceable Through Title V Permit
15. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63.6603/63.6640 Table 2d, Row 4.a] Federally Enforceable Through Title V Permit
16. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603/63.6640 Table 2d, Row 4.b] Federally Enforceable Through Title V Permit
17. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63.6603/63.6640 Table 2d, Row 4.c] Federally Enforceable Through Title V Permit
18. The permittee shall keep records of the maintenance conducted on the engine. [40 CFR 63.6655(e)] Federally Enforceable Through Title V Permit

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

San Joaquin Valley *Air Pollution Control District*

PERMIT UNIT: N-2149-8-2

EXPIRATION DATE: 11/30/2021

EQUIPMENT DESCRIPTION:

DRY MILK BLENDING OPERATION CONSISTING OF TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY A 4,250 CFM DONALDSON MODEL 2DF12 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The dust collector shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filters. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement filters numbering at least 10% of the total number of filters in the dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 12 inches water column. [District Rule 2201]
8. The quantity of dry milk processed shall not exceed 72.0 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.00022 pounds per ton of the dry milk processed. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain daily records of the quantity of dry milk processed, in tons, and shall keep the records on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the differential operating pressure on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the baghouse maintenance, including all change outs of filter media. [District Rule 2201] Federally Enforceable Through Title V Permit
13. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
14. Visible emissions from the source operation shall be evaluated using EPA method 22 once per calendar year. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] 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.

15. Annual records of visible emissions monitoring results shall be maintained and retained on the premises for a period of at least 5 years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Detailed Summary List of Facility Permits

Detailed Facility Report
For Facility=2149 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

CALIFORNIA DAIRIES, INC. 475 S TEGNER RD TURLOCK, CA 95380	FAC #	N 2149	TYPE:	TitleV	EXPIRE ON:	11/30/2021
	STATUS:	A	TOXIC ID:	70160	AREA:	2 /
	TELEPHONE:				INSP. DATE:	02/22

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2149-1-4	64.5 hp (electrical motor)	3020-01 C	1	239.00	239.00	A	POWDERED MILK BAGGING OPERATION SERVED BY A NIRO ATOMIZER MODEL BHN-55/57-81 BAGHOUSE WITH A MAXIMUM FLOW RATE OF 7,500 SCFM
N-2149-2-8	11.2 MMBtu/hr dryer	3020-02 G	1	980.00	980.00	A	11.2 MMBTU/HR NIRO MODEL H1800 NATURAL GAS FIRED MILK DRYER WITH A MAXON BURNER SERVED BY A WET SCRUBBER (PLANT 1)
N-2149-3-8	60.6 MMBtu/hr boiler	3020-02 H	1	1,238.00	1,238.00	A	60.6 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM (BOILER #1)
N-2149-4-8	60.7 MMBtu/hr boiler	3020-02 H	1	1,238.00	1,238.00	A	60.7 MMBTU/HR NEBRASKA MODEL NS-C-61-ECON NATURAL GAS-FIRED BOILER WITH AN ALZETA MODEL CSB642R-LEA ULTRA LOW NOX BURNER (BOILER #2)
N-2149-5-6	31.5 MMBtu/hr dryer	3020-02 H	1	1,238.00	1,238.00	A	31.5 MMBTU/HR NIRO MODEL CDI 1600 NATURAL GAS FIRED MILK DRYER WITH A MAXON LOW NOX BURNER SERVED BY TWO NIRO BAGHOUSES, PNEUMATIC POWDER MILK CONVEYING EQUIPMENT, AND FOUR STORAGE SILOS SERVED BY FABRIC FILTERS (PLANT 2)
N-2149-6-3	72 hp (electrical motor)	3020-01 C	1	239.00	239.00	A	POWDER MILK BAGGING OPERATION WITH A NIRO AVAPAC FILLER SERVED BY A NIRO BAGHOUSE
N-2149-7-3	2,220 bhp emergency IC engine	3020-10 F	1	900.00	900.00	A	2,220 BHP (INTERMITTENT) CUMMINS MODEL KTA50-G9 DIESEL FIRED EMERGENCY STANDBY IC ENGINE SERVING AN ELECTRICAL GENERATOR
N-2149-8-2	105 hp (electrical motor)	3020-01 D	1	379.00	379.00	A	DRY MILK BLENDING OPERATION CONSISTING OF TWO BLENDERS, A BAG DUMP, TWO TOTE DUMPS, A RAW INGREDIENT RECEIVER, AND CONVEYING EQUIPMENT SERVED BY A 4,250 CFM DONALDSON MODEL 2DF12 DUST COLLECTOR

Number of Facilities Reported: 1

ATTACHMENT D

District Rule 4601 Stringency Analysis

Stringency Comparison of District Rule 4601 Non-SIP Version (4/16/20) to Current SIP Version (12/17/09)

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
<p>2.0 Applicability</p>	<p>This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.</p>	<p>This rule is applicable to any person who supplies, markets, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.</p>	<p>The only change is to include applicability of this rule to the person marketing the coatings, therefore, non-SIP version of rule is more stringent than SIP version.</p>
<p>4.0 Exemptions</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2 and Section 4.3, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less, provided the following requirements are met:</p> <p>4.2.1 The coating container is not bundled together with other containers of the same specific coating category (listed in Table 1) to be sold as a unit that exceeds one liter (1.057 quart), excluding containers packed together for shipping to a retail outlet, and</p> <p>4.2.2 The label or any other product literature does not suggest combining multiple containers of the same specific category (listed in Table 1) so that the combination exceeds one liter (1.057 quart).</p> <p>4.3 On and after sixty days following the effective date of EPA final rulemaking that the conditions described in Clean Air Act Sections 172(c)(9) and 182(c)(9) have occurred in the San Joaquin Valley regarding the 2008 8-hour Ozone National Ambient Air Quality Standard, the categories of coatings listed below shall no longer be exempt from the provisions of Table 1 of this rule when sold in containers having capacities of one liter (1.057 quarts) or less:</p> <p>4.3.1 Bituminous Roof Coatings;</p>	<p>The exemptions for colorant and for architectural coatings sold in a container with a volume of one liter (1.057 quarts) or less have been added to the rule in order to make the amended rule consistent with the exemptions presented in 2020 California Air Resources Board (ARB) Suggested Control Measures (SCM) for Architectural Coatings. Therefore, the non-SIP version of the rule is as stringent as the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
		<p>4.3.2 Flat Coatings that are sold in containers having capacities greater than eight fluid ounces;</p> <p>4.3.3 Magnesite Cement Coatings;</p> <p>4.3.4 Multi-Color Coatings;</p> <p>4.3.5 Nonflat Coatings that are sold in containers having capacities greater than eight fluid ounces;</p> <p>4.3.6 Pre-Treatment Wash Primers;</p> <p>4.3.7 Reactive Penetrating Sealers;</p> <p>4.3.8 Shellacs (Clear and Opaque);</p> <p>4.3.9 Stone Consolidants;</p> <p>4.3.10 Swimming Pool Coatings;</p> <p>4.3.11 Tub and Tile Refinishing Coatings;</p> <p>4.3.12 Wood Coatings, including Lacquers, Varnishes, and Sanding Sealers; and</p> <p>4.3.13 Wood Preservatives.</p> <p>4.4 Colorant added at the factory or at the worksite is not subject to the VOC limits in Table 2. In addition, containers of colorant sold at the point of sale for use in the field or on a job site are also not subject to the VOC limit in Table 2.</p>	
<p>5.0 Requirements</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p> <p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, market or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2, after the specified effective date in Table 1 or Table 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p> <p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in Table 1 or, then that coating is not required to meet the VOC limits for Flat or Nonflat coatings, but is required to meet the VOC limit for the applicable specialty coating listed in Table 1 or . With the exception of the specialty coating categories specified in Sections 5.2.1 through 5.2.12, if a coating is recommended for use in more than one of the specialty coating categories listed in Table 1, then the most restrictive (or lowest) VOC content limit shall apply. This requirement applies to: usage recommendations that appear anywhere on the coating</p>	<p>The Table of Standards 1 and the Table of Standard 2 have been replaced with more stringent Table 1 with VOC content limit for coatings and Table 2 with VOC content limit for colorants with more stringent VOC limits as shown in the tables at the end of this document. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p> <p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.3.2 Metallic pigmented coatings</p> <p>5.2.3.3 Shellacs</p> <p>5.2.3.4 Fire-retardant coatings</p> <p>5.2.3.5 Pretreatment wash primers</p> <p>5.2.3.6 Industrial maintenance coatings</p> <p>5.2.3.7 Low-solids coatings</p> <p>5.2.3.8 Wood preservatives</p> <p>5.2.3.9 High temperature coatings</p> <p>5.2.3.10 Temperature-indicator safety coatings</p> <p>5.2.3.11 Antenna coatings</p> <p>5.2.3.12 Antifouling coatings</p> <p>5.2.3.13 Flow coatings</p> <p>5.2.3.14 Bituminous roof primers</p> <p>5.2.3.15 Specialty primers, sealers and undercoaters</p> <p>5.2.3.16 Aluminum roof coatings</p> <p>5.2.3.17 Zinc-rich primers</p> <p>5.2.3.18 Wood Coatings</p>	<p>container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.1 Metallic pigmented coatings;</p> <p>5.2.2 Shellacs;</p> <p>5.2.3 Pretreatment wash primers;</p> <p>5.2.4 Industrial maintenance coatings;</p> <p>5.2.5 Low-solids coatings;</p> <p>5.2.6 Wood preservatives;</p> <p>5.2.7 High temperature coatings;</p> <p>5.2.8 Bituminous roof primers;</p> <p>5.2.9 Specialty primers, sealers and undercoaters;</p> <p>5.2.10 Aluminum roof coatings;</p> <p>5.2.11 Zinc-rich primers; and</p> <p>5.2.12 Wood Coatings.</p>	
	<p>5.3 Sell-Through of Coatings: A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any</p>	<p>5.3 Sell-Through of Coatings: 5.3.1 A coating manufactured prior to January 1, 2022, may be sold, supplied, or offered for sale for up to three years after January 1, 2022. In addition, a coating manufactured before January 1, 2022 may be applied at any time, both before and after January 1, 2022, so long as the coating complied with the standards in effect at the time the coating was manufactured. This subsection 5.3.1 does not apply to any coating that does not display the date or date-code required by subsection 6.1.1. 5.3.2 A colorant manufactured prior to January 1, 2022, may be sold, supplied, or offered for sale for up to three years after January 1, 2022. In addition, a</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	coating that does not display the date or date-code required by Section 6.1.1.	colorant manufactured before January 1, 2022 may be applied at any time, both before and after January 1, 2022, so long as the colorant complied with the standards in effect at the time the colorant was manufactured. This subsection 5.3.2 does not apply to any colorant that does not display the date or date-code required by subsection 6.1.1.	
	5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.	5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
	5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.	5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
	5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.		The VOC limit of the SIP version is no longer applicable at this time and has been removed.
	5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.	5.6 Coatings Not Listed in Table 1: For any coating that does not meet any of the definitions for the specialty coatings categories listed in Table 1, the VOC content limit shall be determined by classifying the coating as Flat or Nonflat, based on its gloss, and the corresponding Flat or Nonflat VOC limit in Table 1 shall apply.	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
		5.7 Colorants: No person within the District shall, at the point of sale of any architectural coating subject to subsection 5.1, add to such coating any colorant that contains VOCs in excess of the corresponding applicable VOC limit specified in Table 2. The point of sale includes retail outlets that add colorant to a coating container to obtain a specific color.	The VOC limit for colorants in non-SIP version more stringent than the SIP version of the rule.
	5.8 Prior to January 1, 2011, any coating that		The VOC limit of the SIP

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.		version is no longer applicable at this time and has been removed.
	Table of Standards 1 (Effective on and after 1/1/11)	Table 1 VOC Content Limits for Coatings (Effective on and after 1/1/22) (See end of the document for Table Comparison)	The requirements of Table of Standard 1 are more stringent than the Table 1 in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.
	Table of Standards 2 (Effective on and after 1/1/11)	Table 2 VOC Content Limits for Colorants (Effective on and after 1/1/22) (See end of the document for Table Comparison)	VOC content limits for colorants were added under the amended rule. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
6.0 Administrative Requirements	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined</p>	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.12 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p>	The non-SIP approved rule contain sections listed in the SIP rule plus additional requirements not found in the SIP version for colorants. Therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in</p>	<p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: The labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.6 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: The labels of all specialty primers, sealers, and undercoaters shall prominently display the statement "Specialty Primer, Sealer, Undercoater"</p> <p>6.1.8 Reactive Penetrating Sealers: The labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.9 Stone Consolidants: The labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words "High Gloss."</p> <p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 "For industrial use only"</p> <p>6.1.14.2 "For professional use only"</p> <p>6.1.14.3 "Not for residential use" or "Not intended for residential use"</p>	<p>6.1.10 Wood Coatings: The labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.11 Zinc Rich Primers: The labels of all Zinc Rich Primers shall prominently display the statement "For professional use only."</p> <p>6.1.12 Colorants: Effective January 1, 2022, each manufacturer of any colorant subject to this rule shall display the information listed in subsections 6.1.12.1 and 6.1.12.2 on the container (or label) in which the colorant is sold or distributed.</p> <p>6.1.12.1 Date Code: The date the colorant was manufactured, or a date code representing the date, shall be indicated on the label, lid, or bottom of the container. If the manufacturer uses a date code for any colorant, the manufacturer shall file an explanation of each code with the APCO.</p> <p>6.1.12.2 VOC Content: Each container of any colorant subject to this rule shall display one of the following values in grams of VOC per liter of colorant.</p> <p>6.1.12.2.1 Maximum VOC Content as determined from all potential product formulations; or</p> <p>6.1.12.2.2 VOC Content as determined from actual formulation data; or</p> <p>6.1.12.2.3 VOC Content as determined using the test methods in subsection 6.3.2.</p> <p>If the colorant contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing. VOC Content shall be determined as defined in subsections 3.72, 3.73, and 3.74.</p>	
	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the</p>	<p>6.2 Reporting Requirements</p> <p>6.2.1 Sales Data: All sales data listed in Sections 6.2.1.1 to 6.2.1.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of CARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in</p>	<p>All the reporting requirements were removed except the sales data requirements presented in 2020 California Air Resources Board (ARB) Suggested Control Measures (SCM) for Architectural Coatings in order to make the amended rule consistent with SCM. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2 to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons</p>	<p>accordance with the procedures specified in Title 17, California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.1.1 through 6.2.1.14:</p> <p>6.2.1.1 The name and mailing address of the manufacturer;</p> <p>6.2.1.2 The name, address and telephone number of a contact person;</p> <p>6.2.1.3 The name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.1.4 Whether the product is marketed for interior or exterior use or both;</p> <p>6.2.1.5 The number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.1.6 The VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.1.7 The names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.1.8 The names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.1.9 Whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.1.10 Description of resin or binder in the product;</p> <p>6.2.1.11 Whether the coating is a single-component or multi-component product;</p> <p>6.2.1.12 The density of the product in pounds per gallon;</p> <p>6.2.1.13 The percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17, California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <p>6.2.7.1 the name and mailing address of the manufacturer;</p> <p>6.2.7.2 the name, address and telephone number of a contact person;</p> <p>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.7.4 whether the product is marketed for interior or exterior use or both;</p> <p>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended</p>	<p>definition; and</p> <p>6.2.1.14 The percent by volume of solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.7.7 the names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.7.10 description of resin or binder in the product;</p> <p>6.2.7.11 whether the coating is a single-component or multi-component product;</p> <p>6.2.7.12 the density of the product in pounds per gallon;</p> <p>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>		
	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including</p>	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in Table 1 or the 2, the VOC content of a coating shall be determined as defined in Section 3.71, 3.72, or 3.73 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including</p>	<p>Numerous definitions were added, deleted or modified in order to make the amended rule consistent with definitions and rule requirements presented in 2020 California Air Resources Board (ARB) Suggested Control Measures (SCM) for Architectural Coatings. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 1, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of</p>	<p>the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating or colorant in order to perform the calculations in Section 3.71 and 3.73, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.15. An alternative method to determine the VOC content of coatings or colorants is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1996), BAAQMD Method 43 (Revised 2005), or BAAQMD Method 41 (Revised 2005), as applicable. To determine the VOC content of a coating or colorant, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.4, formulation data, or any other reasonable means for predicting that the coating or colorant has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.4. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 To determine the VOC content of a coating or colorant with a VOC content of 150 g/l or less, the manufacturer may use SCAQMD Method 313, incorporated by reference in subsection 6.3.34, ASTM D6886-18, incorporated by reference in subsection 6.3.35, or any other reasonable means for predicting that the coating or colorant has been formulated as intended (e.g., quality assurance checks, record keeping).</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>multicomponent coatings.</p> <p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p> <p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes:</p>	<p>6.3.4 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 4, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.5 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.6 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-18B, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.7 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-18ce1, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.8 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-14 (2018), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating and Nonflat Coating).</p> <p>6.3.9 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.10 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-17, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p> <p>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic,</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</p> <p>6.3.16 <i>Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," SCAQMD Laboratory Methods of Analysis for Enforcement Samples.</i></p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September</p>	<p>branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, revised 2006 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.12 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, revised 2006 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds: The content of compounds exempted under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i>.</p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59,</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p> <p>6.3.25 Reactive Penetrating Sealer Water</p>	<p>subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.17 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-17, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.18 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585/4585M-18, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-17, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.19 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05 (2011)e2, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-14, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.21 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585/4585M-18, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02 (2017), "Standard Test Method for Evaluating Degree of Blistering of Paints".</p> <p>6.3.22 Waterproofing Membrane: Waterproofing membrane shall be ASTM C836/836M-18, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.23 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-16, "Standard Test Method for Resistance to Growth of Mold on the</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	<p>Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-09 (2017), "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Fungal or Algal Growth or Soil and Dirt Accumulation". 6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.24 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67/C67M-18, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97/97M-18, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-140M-18a, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units"</p> <p>6.3.25 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-16, "Standard Test Method for Water Vapor Transmission of Materials" or ASTM D6490-99 (2014), "Standard Test Method for Water Vapor Transmission of Nonfilm Forming Treatments Used on Cementitious Panels".</p> <p>6.3.26 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.27 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01 (2008), "Standard Guide for Selection and Use of Stone Consolidants".</p> <p>6.3.28 Building Envelope Coating Air Permeance of Building Materials: ASTM E2178-13, "Standard Test Method for Air Permeance of Building Materials".</p> <p>6.3.29 Building Envelope Coating Water</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
		<p>Penetration Testing: ASTM E331-00 (2016), "Standard Test Method for Water Penetration of Exterior Windows, Skylights, Doors, and Curtain Walls by Uniform Static Air Pressure Difference".</p> <p>6.3.30 Building Envelope Coating Water Vapor Transmission: ASTM E96/96M-16, "Standard Test Methods for Water Vapor Transmission of Materials".</p> <p>6.3.31 Tile and Stone Sealers Absorption: ASTM C373-18, "Standard Test Methods for Determination of Water Absorption and Associated Properties by Vacuum Method for Pressed Ceramic Tile and Glass Tiles and Boil Method for Extruded Ceramic Tiles and Non-tile Fired Ceramic Whiteware Products"; or ASTM C97/97M-18, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C642-13, "Standard Test Method for Density, Absorption, and Voids in Hardened Concrete".</p> <p>6.3.32 Tile and Stone Sealers – Static Coefficient of Friction: ANSI A137.1 (2012), "American National Standard of Specifications for Ceramic Tile".</p> <p>6.3.33 Tile and Stone Sealers Water Vapor Transmissions: ASTM E96/96M-16, "Standard Test Methods for Water Vapor Transmission of Materials".</p> <p>6.3.34 VOC Content of Coatings: South Coast AQMD Method 313, "Determination of Volatile Organic Compounds (VOC) by Gas Chromatography/Mass Spectrometry/Flame Ionization Detection (GS/MS/FID)".</p> <p>6.3.35 VOC Content of Coatings: ASTM D6886-18, "Standard Test Method for Determination of the Weight Percent Individual Volatile Organic Compounds in Waterborne Air-Dry Coatings by Gas Chromatography".</p>	
7.0 Compliance Schedule	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

Here is the link to 2020 California Air Resources Board (ARB) Suggested Control Measures (SCM) for Architectural Coatings:

https://ww2.arb.ca.gov/sites/default/files/2020-07/2020SCM_final.pdf

District Rule 4601 was amended (4/16/20). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.

Table 1 VOC Content Limits for Coatings		
COATING CATEGORY	Current Rule 4601 VOC Limit (g/l) Effective on and after 1/1/2012	Amended Rule 4601 VOC Limit (g/l) Effective on and after 1/1/2022
Flat Coatings	50	50
Nonflat Coatings	100	50
Specialty Coatings -		
Aluminum Roof Coatings	400	100
Basement Specialty Coatings	400	400
Bituminous Roof Coatings	50	50
Bituminous Roof Primers	350	350
Bond Breakers	350	350
Building Envelope Coatings	-	50
Concrete Curing Compounds	350	350
Concrete/Masonry Sealers	100	100
Driveway Sealers	50	50
Dry Fog Coatings	150	50
Faux Finishing Coatings	350	350
Fire Resistive Coatings	350	150
Floor Coatings	100	50
Form-Release Compounds	250	100
Graphic Arts Coatings (Sign Paints)	500	500
High Temperature Coatings	420	420
Industrial Maintenance Coatings	250	250
Low Solids Coatings ¹²	120 ¹	120 ¹
Magnesite Cement Coatings	450	450
Mastic Texture Coatings	100	100
Metallic Pigmented Coatings	500	500
Multi-Color Coatings	250	250
Pre-Treatment Wash Primers	420	420
Primers, Sealers, and Undercoaters	100	100
Reactive Penetrating Sealers	350	350
Recycled Coatings	250	250
Roof Coatings	50	50
Rust Preventative Coatings	250	250
Shellacs:		
Clear	730	730
Opaque	550	550
Specialty Primers, Sealers, and Undercoaters	100	100
Stains	250	100
Interior Stains	250	
Stone Consolidants	450	450
Swimming Pool Coatings	340	340

Tile and Stone Sealers	100	
Traffic Marking Coatings	100	100
Tub and Tile Refinish Coatings	420	420
Waterproofing Membranes	250	100
Wood Coatings	275	275
Wood Preservatives	350	350
Zinc-Rich Primers	340	340

Table 2 VOC Content Limits for Colorants

Colorants Added To	VOC Limit (g/l) Effective on and after 1/1/2022
Architectural Coatings, excluding Industrial Maintenance Coatings	50
Solvent Based Industrial Maintenance Coatings	600
Waterborne Industrial Maintenance Coatings	50
Wood Coatings	600