San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

May 9, 2023

Mr. Will Clark
Diamond Pet Foods - Ripon
942 S. Stockton Ave
Ripon, CA 95366

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
Facility Number: N-8234
Project Number: N-1213836

Dear Mr. Clark:

Enclosed for your review is the District's analysis of Diamond Pet Foods - Ripon's application for the Federally Mandated Operating Permit for its operation at 942 S. Stockton Ave in Ripon, 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 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. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Sincerely,

Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Gerardo Rios, EPA (w/enclosure) via EPS

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SAN JOAQUIN VALLEY
UNIFIED AIR POLLUTION CONTROL DISTRICT

Proposed Initial TV Engineering Evaluation

Diamond Pet Foods - Ripon
N-8234

Table of Contents

TITLE V APPLICATION REVIEW
Pet Food Manufacturing Operation

Engineer: Jagmeet Kahlon
Date: May 8, 2023

Facility Number: N-8234
Facility Name: Diamond Pet Foods - Ripon
Mailing Address: 942 S Stockton Ave
Ripon, CA 95366

Contact Name: Will Clark
Title: Plant Manager
Phone: (209) 824-4640

Responsible Official: Will Clark
Title: Plant Manager

Project # : N-1213836
Deemed Complete: January 11, 2022

I. PROPOSAL

Diamond Pet Foods - Ripon is proposing that an initial Title V permit be issued for its existing pet food manufacturing plant in Ripon, California. Diamond Pet Foods - Ripon is applying for a Title V permit because it's potential to emit for nitrogen oxides (NOx) emissions is above the District's Major Source threshold of 20,000 pounds per year.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

Diamond Pet Foods - Ripon is located at 942 S Stockton Ave in Ripon, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in **Attachment B**.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in **Attachment C**. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has requested to use the following model general permit templates:

A. Template SJV-UM-03 Facility-wide Umbrella

The applicant has requested to utilize template SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

Conditions 1 through 22, and 26 through 40 in facility-wide permit requirement permit N-8234-0-0 including their underlying applicable requirements originate from template SJV-UM-0-3 and are not subject to further EPA or public review.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

As stated previously, the applicant has proposed to utilize template SJV-UM-0-3, Facility Wide Umbrella. Requirements in the following rules are addressed in the facility-wide umbrella template:

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 20, 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 2520, Federally Mandated Operating Permits
(Amended August 15, 2019) Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16, and 10.0

District Rule 4101, Visible Emissions
(Amended February 17, 2005)

District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Construction, Demolition, Excavation, and Extraction Activities
(Amended August 19, 2004)

District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Handling and Storage of Bulk Materials
(Amended August 19, 2004)

District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Carryout and Trackout
(Amended August 19, 2004)

District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Open Areas
(Amended August 19, 2004)

District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Paved and Unpaved Roads
(Amended August 19, 2004)

District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Unpaved Vehicle/Equipment Areas
(Amended September 16, 2004)

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

40 CFR Part 82, Subpart B and F, Stratospheric Ozone

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

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 2201, New and Modified Stationary Source Review Rule
(Amended August 15, 2019)

District Rule 2520, Federally Mandated Operating Permits
(Amended August 15, 2019) Sections not addressed by Umbrella Template

District Rule 4001, New Source Performance Standards
(Amended April 14, 1999)

40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
(Amended February 16, 2012)

40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
(Amended August 10, 2022)

District Rule 4002, National Emission Standards for Hazardous Air Pollutants
(Amended May 20, 2004)

40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
(Amended August 10, 2022)

40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
(Amended October 6, 2022)

40 CFR Part 63 Subpart JJJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
(Amended September 14, 2016)

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 4306, Boilers, Steam Generators, and Process Heaters – Phase 3
(Amended December 17, 2020)

District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr
(Amended December 17, 2020)

District Rule 4351, Boilers, Steam Generators and Process Heaters-Phase 1
(Amended August 21, 2003)

District Rule 4601, Architectural Coatings
(Amended April 16, 2020)

District Rule 4701, Internal Combustion Engines – Phase 1
(Amended August 21, 2003)

District Rule 4702, Internal Combustion Engines
(Amended August 19, 2021)

District Rule 4801, Sulfur Compounds
(Amended December 17, 1992)

District Rule 4309, Dryers, Dehydrators, and Ovens
(Adopted December 15, 2005)

Title 17 California Code of Regulations (CCR), Section 93115, Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines
(Effective February 19, 2011)

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

VIII. 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.

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102, Nuisance
(Amended December 17, 1992)

Condition 41 of the requirements for facility wide permit N-8234-0-0 is based on the rule listed above and is not Federally Enforceable through Title V permit.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-3 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 22 and 26 through 40 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

District Rule 1070, Inspections

This rule requires that the inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations. Further, the District has the authority to require recordkeeping, to make inspections and to conduct tests of air pollution sources.

The necessary recordkeeping requirements are included in each Permit to Operate. Thus, compliance is expected with this rule.

District Rule 1080, Stack Monitoring

This rule grants the APCO authority to request the installation, use, maintenance, and inspection of continuous monitoring equipment. This rule also specifies the performance standards for the equipment and administrative recordkeeping, reporting, and violation and equipment breakdown notification requirements.

This facility uses continuous emission rate monitoring system (CERMS) to continuously measures and records exhaust gas NOx concentrations and exhaust flow rate, at the exhaust stack of each of the three regenerative thermal oxidizers (RTOs) serving pet food manufacturing lines.

Condition 51 through '-63 in the proposed permits N-8234-4-14, '-5-14 and '-6-14 ensures ongoing compliance with this rule.

District Rule 1081, Source Sampling

This rule ensures that any source operation that emits or may emit air contaminants provides adequate and safe facilities for use in sampling to determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

Periodic source testing is required for pet food manufacturing lines (N-8234-4, '-5 and '-6) and the boilers (N-8234-10 and '-11).

Conditions 32, 33, 35, 50, 64 and 65 in permits N-8234-4-14, '-5-14 and '-6-14 ensure ongoing compliance with the requirements of this rule.

Condition 14, 19, 23, 24 and 30 in permits N-8234-10-3 and '-11-3 ensure ongoing compliance with the requirements of this rule.

District Rule 2201, New and Modified Stationary Source Review Rule

The requirements in this rule only trigger for new emission unit(s) or when an existing unit undergoes a modification. Note that an emission unit that was previously exempt from written permits at the time of installation, which becomes subject to the provisions of Rule 2010 (Permits Required) are not subject to Rule 2201 until such time that the emissions unit is modified.

All applicable requirements from any permit actions related to this rule have already been incorporated into the permits. These requirements are now federally-enforceable through the Title V permit per guidance in the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995. The following table summarizes permit number, NSR conditions in the current PTO and NSR conditions in the Title V being issued as part of this project.

Permit #	NSR conditions in current PTO	NSR conditions in proposed initial Title V
N-8234-1 (Pet Food Material Receiving, Storage & Loadout Operations)	1, 2, 3, 7, 8 through 11 (PTO N-8234-1-2)	1, 2, 3, 5 through 9
N-8234-2 (Pet Food Material Dispensing, Conveying & Storage Operations)	1, 2, 7 through 12 (PTO N-8234-2-6)	1, 2, 5 through 10
N-8234-3 (Pet Food Material Dispensing, Mixing, Grinding, Screening & associated Conveying Operations)	1 through 4, 9 through 17 (PTO N-8234-3-4)	1 through 4, 7 through 15
N-8234-4 (Pet Food Processing Line #1)	5 through 28, 30, 35, 36, 39 through 50, 52 through 58, 63, 64, 69 through 72 (PTO N-8234-4-12)	4 through 27, 29, 34, 35, 38 through 49, 51 through 57, 62, 63, 66 through 69
N-8234-5 (Pet Food Processing Line #2)	5 through 28, 30, 35, 36, 39 through 50, 52 through 58, 63, 64, 69 through 72 (PTO N-8234-5-12)	4 through 27, 29, 34, 35, 38 through 49, 51 through 57, 62, 63, 66 through 69
N-8234-6-12 (Pet Food Processing Line #3)	5 through 28, 30, 35, 36, 39 through 50, 52 through 58, 63, 64, 69 through 72 (PTO N-8234-6-12)	4 through 27, 29, 34, 35, 38 through 49, 51 through 57, 62, 63, 66 through 69
N-8234-7 (Thiele Packaging Line 1)	1, 5 through 9 (PTO N-8234-7-1)	1, 3 through 7
N-8234-8 (Thiele Packaging Line 2)	1, 5 through 9 (PTO N-8234-8-1)	1, 3 through 7
N-8234-9 (UVA Packaging Line 3)	1, 5 through 9 (PTO N-8234-9-1)	1, 3 through 7
N-8234-10 (14.65 MMBtu/hr natural gas-fired boiler with SCR system)	5 through 13, 15, 25 through 29, 32 and 33 (PTO N-8234-10-2)	3, 4, 7 through 13, 15, 25 through 29, 32 and 33

Permit #	NSR conditions in PTO	NSR conditions in proposed initial Title V
N-8234-11 (14.65 MMBtu/hr natural gas-fired boiler with SCR system)	5 through 13, 15, 25 through 29, 32 and 33 (PTO N-8234-11-2)	3, 4, 7 through 13, 15, 25 through 29, 32 and 33
N-8234-12-0 (270 bhp diesel-fired emergency fire pump engine)	3, 6 and 9 (PTO N-8234-12-0)	1, 4 and 5
N-8234-14-0 (Thiele Packaging Line 4)	1,5 through 9 (PTO N-8234-14-0)	1, 3 through 7
N-8234-19-0 (Centralized Vacuum Cleaning System)	4 through 14 (PTO N-8234-19-0)	2 through 12

District Rule 2520, Federally Mandated Operating Permits

This rule has been amended since the approval of facility-wide template SJV-UM-0-3.

The amendments to this rule were administrative, related only to the notification procedures for Title V permit modifications that are required to go through a public notice. Public notices are required to be published online on District's website. The amendments to this rule did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation.

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.

District Rule 4001, New Source Performance Standards

40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
(Amended February 16, 2012)

This subpart applies to steam generating units that are constructed, reconstructed, or modified after 6/9/89 and have a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. Subpart Dc has standards for SO_X and PM_{10} emissions.

Diamond Pet Foods-Ripon has two 14.65 MMBtu/hr (each) natural gas-fired boilers, each equipped with its own selective catalytic reduction (SCR) system. These boilers are subject to the requirements in this subpart. The requirements are discussed in the following section:

60.42c – Standards for Sulfur Dioxide

Since coal is not combusted in the boiler,s the requirements of this section are not applicable.

60.43c – Standards for Particulate Matter

The boilers are not fired on coal, combusts mixtures of coal with other fuels, combusts wood, combusts mixtured of wood with other fuels, or oil; therefore these units are not subject to the requirements of this section.

60.44c – Compliance and Performance Tests Methods and Procedures for Sulfur Dioxide

The boilers are not subject to the sulfur dioxide requirements of this subpart. Therefore, this section does not apply.

60.45c – Compliance and Performance Test Methods and Procedures for Particulate Matter

The boilers are not subject to the particulate matter requirements of this subpart. Therefore, this section does not apply.

60.46c – Emission Monitoring for Sulfur Dioxide

The boilers are not subject to the sulfur dioxide requirements of this subpart. Therefore, this section does not apply.

60.47c – Emission Monitoring for Particulate Matter

The boilers are not subject to the particulate matter requirements of this subpart. Therefore, this section does not apply.

60.48c – Reporting and Recordingkeeping Requirements

Section 60.48c (a) states that the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

The design heat input capacity and type of fuel combusted is listed in the equipment description or in the permit. Therefore, no additional conditions are necessary.

(2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel mixture of fuels under §60.42c or §40.43c.

This requirement is not applicable since the unit is not subject to §60.42c or §60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

The boiler is limited to an annual heat input rate of 48,753 MMBtu. This equates to about 55% capacity factor. The boiler uses PUC quality natural gas fuel.

(4) Notification if an emerging technology will be used for controlling SO_2 emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator

This requirement is not applicable since the unit will not be equipped with emerging technology used to control SO_2 emissions.

Section 60.48c(g)(2), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. The following conditions in permits N-8234-10-2 and '-11-2 ensure on-going compliance with this section:

- A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.48c(g)]

- The permittee shall maintain monthly records of the type of fuel and the amount of the fuel combusted (scf/month) by the boiler. [40 CFR 60.48c(g)]

Section 60.48c(i) states that all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. The following conditions in permits N-8234-10-2 and '-11-2 ensure on-going compliance with this section:

- All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4305, 4306 and 4320, and 40 CFR 60.48c(i)]

Compliance is expected with this regulation.

<u>40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
(Amended August 10, 2022)</u>

§ 60.4200 Am I subject to this subpart?

(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in paragraphs (a)(1) through (4) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

(1) Manufacturers of stationary CI ICE with a displacement of less than 30 liters per cylinder where the model year is:

(i) 2007 or later, for engines that are not fire pump engines;

(ii) The model year listed in Table 3 to this subpart or later model year, for fire pump engines (i.e., starting 2009 year model for 175≤HP≤750).

(2) Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are:

(i) Manufactured after April 1, 2006, and are not fire pump engines, or
(ii) Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

(3) Owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005 and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005.

(4) The provisions of §60.4208 of this subpart are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005.

The engine under permit N-8234-12-0 is a 270 bhp diesel-fueled emergency fire pump engine. This engine was installed in July 1999, and was never modified or reconstructed since that time.

Since the engine was manufactured and installed prior to the cutoff date of July 11, 2005, this engine is not subject to the requirements of this subpart.

District Rule 4002, National Emission Standards for Hazardous Air Pollutants (Amended May 20, 2004)

40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Amended August 10, 2022)

§ 63.6585 Am I subject to this subpart?

This subpart applies to owners and operators of stationary reciprocating internal combustion engines (RICE) operated at a major or area source of Hazardous Air Pollutant (HAP) emissions.

Section (b) states a major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68

megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

Section (c) states an area source of HAP emissions is a source that is not a major source.

Per worksheet in **Attachment E** of this document, this facility is not a major source of HAP emissions. This facility is an area source for HAP emissions.

§ 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) *Existing stationary RICE*

(i) For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.

(ii) For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

(iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

(2) *New stationary RICE*

(i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.

(ii) A stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

(iii) A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

The engine under permit N-8234-12 is a 270 bhp diesel-fueled emergency fire pump engine. This engine was installed in July 1999, and was never modified or reconstructed since that time.

Since the engine commenced construction before June 12, 2006, this engine is an Existing RICE under this subpart.

Section (c) Stationary RICE subject to Regulations under 40 CFR Part 60: An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

(1) A new or reconstructed stationary RICE located at an area source;

(2) A new or reconstructed 2SLB stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(3) A new or reconstructed 4SLB stationary RICE with a site rating of less than 250 brake HP located at a major source of HAP emissions;

(4) A new or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(5) A new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;

(6) A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(7) A new or reconstructed compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

The engine under permit N-8234-12 is an existing RICE located at an area source. This engine is not subject to requirements in 40 CFR part 60 subpart IIII (discussed previously). Therefore, further evaluation is required to determine the applicable requirements under this subpart.

§63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

Section (a) states if you own or operate existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to you.

The engine under permit N-8234-12 is subject to item 4 in Table 2d. The following condition(s) will be included in permit N-8234-12 to ensure on-going compliance with the requirements in Table 2d. Note that the engine is not subject to any operating limitations in Table 2b.

- The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR Part 63 Subpart ZZZZ]

- The owner or operator has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the

results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR Part 63 Subpart ZZZZ]

- 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 Part 63 Subpart ZZZZ]

- 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 Part 63 Subpart ZZZZ]

§63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?

Section (b) states that beginning January 1, 2015, if you own or operate an existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates for the purpose specified in § 63.6640(f)(4)(ii), you must use diesel fuel that meets the requirements in 40 CFR 1090.305 for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted.

40 CFR 1090.305 (b) states that sulfur standard – Maximum sulfur content of 15 ppm.

40 CFR 1090.305 (c) states that Cetane index or aromatic content – diesel fuel must meet one of the following standards:

(i) Minimum cetane index of 40;

(ii) Maximum aromatic content of 35 volume percent.

The engine under permit N-8234-12 is required to use CARB certified diesel containing no more than 15 ppmv sulfur by weight. Further, the CARB diesel fuel specification requires no more than 10 v% of aromatic hydrocarbon content (https://ww2.arb.ca.gov/sites/default/files/2020-03/dieselspecs.pdf). The following condition will ensure compliance with this section:

- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 63 Subpart ZZZZ]

§63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?

The engine under permit N-8234-12 is not subject to any emission limitations under this subpart. As such, no initial performance tests are required.

§63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

Section (e)(3) states that if you own or operate an existing emergency or black start stationary RICE located at an area source of HAP emissions, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The following condition will be included in permit N-8234-12:

- The owner or operator shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR Part 63 Subpart ZZZZ]

Section (f) states that if you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

The engines under permits N-8234-12 is already equipped with a non-resettable hour meter. The following condition ensures on-going compliance with this section:

- This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner

or operator's compliance history. [District Rule 4702, 17 CCR 93115, and 40 CFR Part 63 Subpart ZZZZ]

Section (h) states if you operate a new, reconstructed, or existing stationary engine, you 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, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply. The following condition will be included in permits N-8234-12:

- The owner or operator 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 Part 63 Subpart ZZZZ]

§63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?

Section (a) states that you must demonstrate initial compliance with each emission limitation, operating limitation, and other requirement that applies to you according to Table 5 of this subpart.

Section (b) states during the initial performance test, you must establish each operating limitation in Tables 1b and 2b of this subpart that applies to you.

Section (c) states that you must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in §63.6645.

The engine under permit N-8234-12 is not subject to the items in Tables 1b, 2b and 5 of this subpart. Therefore, no further discussion is required.

§63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?

(a) You must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

(b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are

deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

(e) You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.

The engine under permit N-8234-12 is not subject to emissions or operating limitations in this subpart. Therefore, no further discussion is required.

§63.6645 What notifications must I submit and when?

(a) You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following:

(1) An existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

(2) An existing stationary RICE located at an area source of HAP emissions.

(3) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

(4) A new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 HP located at a major source of HAP emissions.

(5) This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.

§§63.7(b) and (c) covers notification of performance test and quality assurance program, 63.8(e) covers performance evaluation of continuous monitoring systems, (f)(4) covers the use of alternative monitoring procedures and (f)(6) covers alternative to the relative accuracy test, 63.9(b) through (e) covers initial notifications when a source becomes subject to a relevant standard (i.e., The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard or within 120 calendar days after the source becomes subject to the relevant standard), 63.9 (g) covers additional notification requirements for sources with continuous monitoring systems, and 63.9(h) covers notification of compliance status.

The engine under permits N-8234-12 is not subject to emissions or operating limitations in this subpart. However, they are subject to the other management practices in this subpart, and are expected to comply with the requirements of this subpart.

§63.6650 What reports must I submit and when?

(a) You must submit each report in Table 7 of this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of this section.

(c) The Compliance report must contain the information in paragraphs (c)(1) through (6) of this section.

(d) For each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in paragraphs (c)(1) through (4) of this section and the information in paragraphs (d)(1) and (2) of this section.

(e) For each deviation from an emission or operating limitation occurring for a stationary RICE where you are using a CMS to comply with the emission and operating limitations in this subpart, you must include information in paragraphs (c)(1) through (4) and (e)(1) through (12) of this section.

(f) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.

(g) If you are operating as a new or reconstructed stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, you must submit an annual report according to Table 7 of this subpart by the date specified unless the Administrator has approved a different schedule, according to the information described in paragraphs (b)(1) through (b)(5) of this section. You must report the data specified in (g)(1) through (g)(3) of this section.

(h) If you own or operate an emergency stationary RICE with a site rating of more than 100 brake HP that operates for the purpose specified in § 63.6640(f)(4)(ii), you must submit an annual report according to the requirements in paragraphs (h)(1) through (3) of this section.

The engine under permit N-8234-12 do not fit in any category in Table 7. Additionally, the unit is not subject to emissions or operating limitations in this subpart.

§63.6655 What records must I keep?

Section (e) states that you must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE:

(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

The following condition will be included in permit N-8234-12:

- The owner or operator shall keep records of the maintenance conducted on the engine to demonstrate that the engine and the associated emissions control equipment (if any) is being operated and maintained according to the manufacturer's maintenance plan. These records shall include, but are not limited to the date, hour meter reading, action performed (e.g., engine oil and filter change/analysis, air filter inspection, hoses and belt inspection, etc.), name of the individual conducting maintenance and company affiliation. [40 CFR Part 63 Subpart ZZZZ]

§63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

The following condition in permit N-8234-12 ensures on-going compliance with this section:

- 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 Part 63 Subpart ZZZZ]

Compliance is expected with this subpart.

40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Amended October 6, 2022)
This subpart is applicable to boilers and process heaters located at Major Sources of HAP emissions.

Per **Attachment E** (HAP Calculations), this facility is not a Major source of HAP emissions. Therefore, the boilers under permits N-8234-10 and '-11 are not subject to the requirements in this subpart.

40 CFR Part 63 Subpart JJJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (Amended September 14, 2016)
Pursuant to Section 63.1195(e) a gas-fired boiler, as defined in Subpart JJJJJ, is not subject to any requirement of this subpart.

Pursuant to section 63.11237, definitions a gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

The boilers under permits N-8234-10 and '-11 meets the definition of a "gas-fired boiler" as these units are required to use PUC quality natural gas fuel. Therefore, Subpart JJJJJJ requirements are not applicable.

District Rule 4201, Particulate Matter Concentration

Section 3.0 prohibits the release or discharge into the atmosphere from any single source operation, dust, fumes, or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions, as determined by the test methods in section 4.0.

The following table summarizes particulate matter concentration calculated during various ATC projects:

Permit #	PM concentration (gr-PM/dscf)	Max. allowed PM Concentration (gr-PM/dscf)	Source
N-8234-1-2 (Pet Food Material Receiving, Storage & Loadout Operations)	0.0032	0.1	Project N-1130470
N-8234-2-6 (Pet Food Material Dispensing, Conveying & Storage Operations)	0.0002	0.1	Project N-1211835
Food Material Dispensing, Mixing, Grinding, Screening & associated Conveying Operations)	0.0032	0.1	
N-8234-4-12 (Pet Food Processing Line #1)	0.003	0.1	Project N-1191493
N-8234-5-12 (Pet Food Processing Line #2)	0.003	0.1	
N-8234-6-12 (Pet Food Processing Line #3)	0.003	0.1	
N-8234-7-1 (Thiele Packaging Line 1)	0.014	0.1	Project N-1160929
N-8234-8-1 (Thiele Packaging Line 2)	0.014	0.1	
N-8234-9-1 (UVA Packaging Line 3)	0.014	0.1	
N-8234-10-2 (14.65 MMBtu/hr natural gas-fired boiler with SCR system)	0.0025	0.1	Refer to Rule 4301 discussion below
N-8234-11-2 (14.65 MMBtu/hr natural gas-fired boiler with SCR system)	0.0025	0.1	
N-8234-12-0 (270 bhp diesel-fired emergency fire pump engine)	0.06	0.1	Project N-991069
N-8234-14-0 (Thiele Packaging Line 4)	0.014	0.1	Project N-1160929
N-8234-19-0 (Centralized Vacuum Cleaning System)	0.0004	0.1	Project N-1213859

Since PM concentration is below 0.1 gr/dscf, continue compliance is expected with this rule.

District Rule 4202, Particulate Matter –Emission Rate

This rule limits the hourly particulate matter emissions from each Source Operation to the result of the one of the following equations, as applicable.

$E_{Max} = 3.59\ P^{0.62}$, where P < 30 tons/hr
$E_{Max} = 17.31\ P^{0.16}$, where P > 30 tons/hr

Where, E_{Max} = Maximum allowable emissions in lb/hr
P = Process weight in tons/hr

Process weight is defined as the total weight of all materials introduced into any specific process, which process may cause any discharge into the atmosphere. Solid fuels charged shall be considered as part of the process weight, but liquid and gaseous fuels and combustion air shall not.

Process emissions were estimated during various ATC projects and are summarized in the following table.

Permit #	$E_{Proposed}$ (lb-PM/hr)	E_{Max} (lb-PM/hr)	Source
N-8234-1-2 (Pet Food Material Receiving, Storage & Loadout Operations)	0.082	32.4	Project N-1130470
N-8234-2-6 (Pet Food Material Dispensing, Conveying & Storage Operations)	0.003	16.3	Project N-1211835
N-8234-3-4 (Pet Food Material Dispensing, Mixing, Grinding, Screening & associated Conveying Operations)	1.0	31.9	
N-8234-4-12 (Pet Food Processing Line #1)	0.995	30.2	PM calculated using data under Project N-1191493*
N-8234-5-12 (Pet Food Processing Line #2)	0.995	30.2	
N-8234-6-12 (Pet Food Processing Line #3)	0.995	30.2	

Permit #	$E_{Proposed}$ (lb-PM/hr)	E_{Max} (lb-PM/hr)	Source
N-8234-7-1 (Thiele Packaging Line 1)	0.1	32.4	Project N-1160929**
N-8234-8-1 (Thiele Packaging Line 2)	0.1	32.4	
N-8234-9-1 (UVA Packaging Line 3)	0.1	32.4	
N-8234-14-0 (Thiele Packaging Line 4)	0.1	32.4	
N-8234-10-2 (14.65 MMBtu/hr natural gas-fired boiler with SCR system)	N/A***		
N-8234-11-2 (14.65 MMBtu/hr natural gas-fired boiler with SCR system)	N/A***		
N-8234-12-0 (270 bhp diesel-fired emergency fire pump engine)	N/A****		
N-8234-19-0 (Centralized Vacuum Cleaning System)	0.004	0.5	Project N-1213859

*PM emissions - Individual, as well as, combined total particulate matter from pet food manufacturing lines; $E_{Proposed}$ = 23.9 lb-PM/day ÷ 24 hr/day = 0.995 lb-PM/hr; $E_{Max} = 17.31(32.5)^{0.16}$ = 30.2 lb-PM/hr
**PM emissions - Individual, as well as, particulate matter from pet food packaging lines
*** The boilers use natural gas fuel and combustion air which cannot be counted toward process weight; therefore, maximum emissions cannot be calculated.
****The engine uses diesel fuel and combustion air which cannot be counted toward process weight; therefore, maximum emissions cannot be calculated.

The proposed PM emission rate ($E_{Proposed}$) is not greater than the maximum allowable PM emission rate (E_{max}) for each permit unit. Therefore, compliance is expected with this Rule.

District Rule 4301, Fuel Burning Equipment
(Amended December 17, 1992)

This Rule limits emissions from fuel burning equipment, which is defined as equipment used to burn fuel for the primary purpose of producing heat or power by indirect heat transfer. Section 4.1 provides an exemption for air pollution control equipment.

N-8234-1 through '-3, '-7 through '-9, '-14, '-19
These permit units are not subject to the requirements since the subject units does not involve fuel burning equipment.

N-8234-4, '-5, '-6
Natural gas combustion in dryers:
The dryers are direct-fired heat transfer systems. Therefore, this rule is not applicable to these units.

RTO emissions:
The RTOs are used to reduce VOC emissions and pet food odors. Therefore, these RTOs are considered as air pollution control equipment. Thus, these units are not subject to the requirements of this rule.

N-8234-10, '-11
Each boiler uses natural gas for the primary purpose of producing heat to heat up water or generate steam. Boilers are indirect heat transfer systems, where the products of combustion do not come in direct contact with product being heated. Therefore, these units are subject to the requirements of this rule. The requirements are as follows:

- Combustion contaminates (TSP) - Not to exceed 0.1 gr/dscf @ 12% CO_2 and 10 lb/hr.
- SO_x emissions - Not to exceed 200 lb/hr
- NO_x emissions - Not to exceed 140 lb/hr

The potential NOx, SOx, and TSP emissions are estimated using the permitted levels of emissions:

NOx = (0.011 lb/MMBtu)(14.65 MMBtu/hr)
= 0.16 lb/hr < 140 lb/hr

SOx = (0.00285 lb/MMBtu)(14.65 MMBtu/hr)
= 0.04 lb/hr < 200 lb/hr

PM = (0.003 lb/MMBtu)(14.65 MMBtu/hr)
= 0.04 lb/hr < 10 lb/hr

CO_2 based F-Factor for natural gas combustion is 1,024 dscf/MMBtu at 60˚F. Using this factor, along with the permitted emissions, the grain loading would be:

$$\text{PM}\left(\frac{\text{gr}}{\text{dscf}}\right)=\frac{\left(0.003\ \frac{\text{lb-PM}}{\text{MMBtu}}\right)\left(7{,}000\frac{\text{gr-PM}}{\text{lb-PM}}\right)}{\left(1{,}024\frac{\text{ft}^3}{\text{MMBtu}}\right)\left(\frac{100\%}{12\%}\right)}=0.0025\ \frac{\text{gr-PM}}{\text{dscf}}$$

Since the potential emissions are below the threshold for each pollutant, compliance is expected with this rule.

N-8234-12
The primary purpose of the engine is to provide mechanical power to the electrical generator. Since the engine directly transfer the fuel energy to mechanical power, it does not meet the definition of "fuel burning equipment" (Section 3.1 of the rule). Therefore, the engine is not subject to the requirements of this rule.

District Rule 4304, Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters

Pursuant to District Rules 4305 and 4306, Section 6.3.1, boilers are required to be tested at least once every 12-months. Gaseous fuel fired units demonstrating compliance on two consecutive 12-month source tests may defer the following source test for up to 36 months. During 36-month source testing interval, the operator shall tune the boiler according to section 5.2.1 (tune up at least once each calendar year by qualified technician in accordance with Rule 4304). Tune-ups required by Sections 5.2.1 and 6.3.1 do not need to be performed for units that operate and maintain an APCO approved CEMS or an APCO approved Alternate Monitoring System where the applicable emission limits are periodically monitored.

NOx, CO and O_2 concentrations from the boilers under permit N-8234-10 and '-11 are required to be monitored using a portable analyzer on a monthly basis. Therefore, tune-ups for boilers are not required.

District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2

Since the emission limits of District Rule 4306 and all other requirements are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4306 requirements will satisfy requirements of District Rule 4305.

District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3

Section 2.0 - Applicability
This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a total rated heat input greater than 5 million Btu per hour.

The heat input rate to each fire-tube boiler (N-8234-10, '-11) is greater than 5 MMBtu/hr. Therefore, these units are subject to the requirements of this rule.

Section 5.0 - Requirements
Section 5.1.1, Table 1, Tier 1, limits NO_x and CO emissions to15 ppmvd @ 3% O_2 and 400 ppmvd @ 3% O_2 respectively for units with a rated heat input equal to or less than 20 MMBtu/hr, except for Categories C, D, E, F, G, H & I units.

Each boiler is permitted to achieve 9.0 ppmvd NO_x @ 3% O2 (or less) and 50 ppmvd CO @ 3% O_2 (or less) emissions. The following conditions on each boiler permit ensures on-going compliance with this section:

- NOx emissions shall not exceed 9.0 ppmvd @ 3% O2 (0.011 lb/MMBtu) referenced as NO2. [District Rules 2201, 4305, 4306, 4320 and 4351]

- CO emissions shall not exceed 50 ppmvd @ 3% O2 (0.037 lb/MMBtu). [District Rules 2201, 4305, 4306, 4320 and 4351]

Section 5.1.1, Table 2, Tier 1, limits NO_x and CO emissions to 7 ppmvd @ 3% O_2 and 400 ppmvd @ 3% O_2 respectively for units greater than 5 MMBtu/hr to less than or equal to 20 MMBtu/hr, except for Categories C through E units. The units are required to comply by December 31, 2029 (refer to Table 5, item A. 1b., Compliance deadline). The applicant is required to submit Emission Control Plan and Authority to Construct permit application by May 1, 2028. The following condition will be included in each boiler permit:

- By May 1, 2028, the owner or operator shall submit an Emission Control Plan (pursuant to section 6.4 of District Rule 4306 (12/17/20)) and Authority to Construct permit application identifying the steps to be taken to comply with the Tier 2-NOx and CO limits in Table 2 of District Rule 4306 (12/17/20) by December 31, 2029. [District Rule 4306]

Section 5.2 lists the requirements for boilers limited to a heat input rate of less than 9 billion Btu per calendar year. The boilers (N-8234-10 or '-11) are not be limited to a heat input rate of less than 9 billion Btu per calendar year. Therefore, this section is not applicable.

Section 5.3 states that the NO_x and CO emission limits shall not apply to this unit during start-up and shutdown period provided that the duration of each start-up or each shutdown is not greater than 2.0 hours, and the emission control system is utilized during these periods. An operator may submit a request to allow more than two hours for each startup or each shutdown provided the operator meets all of the conditions specified in sections 5.3.3.1 to 5.3.3.3.

The existing permits do not include any startup or shutdown emission rates and associated duration. The following conditions will be included in each boiler permit:

- Duration of each start-up or each shutdown shall not exceed 2.0 hours. [District Rules 4306 and 4320]

- The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rules 4306 and 4320]

Section 5.4.1 requires the operator to install and maintain a non-resettable, totalizing mass or volumetric flow meter for the units, which simultaneous uses gaseous and liquid fuels and is subject to the requirements of Section 5.1. The boilers are using PUC quality natural gas fuel only. Therefore, they are not required to install and maintain a fuel flow meter under this section.

Section 5.4.2 requires that the units subject to District Rule 4306, Section 5.1 emissions limits, shall either install and maintain Continuous Emission Monitoring (CEM) equipment for NO_X, CO and O_2, or install and maintain APCO-approved alternate monitoring. In order to satisfy the requirements of District Rule 4306, the applicant has proposed to use pre-approved alternate monitoring scheme “H” of District Policy SSP-1105, which requires periodic monitoring of NOx, CO, NH3 and O2 exhaust emissions concentrations. The following conditions will be included on each boiler permit to ensure on-going compliance with this section:

- The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing gas detection tubes (Draeger brand or District approved equivalent). 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 it has been performed within the last month. [District Rules 2201, 4305, 4306, 4320 and 4351]

- If either the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 Rules 2201, 4305, 4306, 4320 and 4351]

- All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 2201, 4305, 4320 and 4351]

- Ammonia emissions readings shall be conducted at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 2201, 4305, 4306, 4320 and 4351]

- The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306, 4320 and 4351]

Section 5.5.1 states the operator of any unit have the option of complying with either the applicable heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limit. The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320 and 4351]

Section 5.5.2 requires 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. The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- 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 4306. [District Rules 4305, 4306, 4320 and 4351]

Section 5.5.3 requires that all CEMS data shall be averaged over a period of 15-consecutive minutes to demonstrate compliance with the applicable emission limits in this rule. Each boiler's emissions are not measured using CEMS system; therefore, this section is not applicable.

Section 5.5.4 requires emissions monitoring pursuant to Sections 5.4.2, 5.4.2.1, and 6.3.1 using a portable NO_X analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings 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. The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 2201, 4305, 4306 and 4320]

Section 5.5.5 requires that for emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, 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. The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- 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 1081, 4305, 4306 and 4320]

Section 6.0 – Administrative Requirements
Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.3 shall be maintained for five calendar years and shall be made available to the APCO upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule. The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4305, 4306, 4320 and 4351, and 40 CFR 60.48c(i)]

Section 6.2 identifies the test methods for determining higher heating value of fuel, NO_x, CO, O_2, stack gas velocities, and stack gas moisture content. The following conditions will be included in each boiler permit to ensure on-going compliance with this section:

- NOx 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, 4320 and 4351]

- CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]

- Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]

In addition, the ammonia slip is required to be measured using BAAQMD Method ST-1B. The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081]

Section 6.3.1 requires that each unit subject to the requirements in section 5.1 or 5.2.3 shall be source tested to determine compliance with the applicable emission limits at least once every 12 months. Units that demonstrate compliance on two consecutive 12-month source tests may defer the following 12-month source test for up to 36 months (no more than 30 days before or after the required 36-month source test date). During the 36-month source testing interval, the operator shall tune the unit in accordance with the provisions of Section 5.2.1, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer to ensure compliance with the applicable emission limits specified in Sections 5.1 or 5.2.3. Tune-ups required by Sections 5.2.1 and 6.3.1 do not need to be performed for units that operate and maintain an APCO approved CEMS or an APCO approved Alternate Monitoring System where the applicable emission limits are periodically monitored.

NOx, CO and O2 concentrations will be measured on a monthly basis using portable analyzer. Therefore, no periodic tune-ups are required. The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- Source testing to measure NOx, CO, and NH3 emissions from this unit while fired on natural gas shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests when unit is fired on natural gas, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 4305, 4306, 4320 and 4351]

Section 6.3.2 lists compliance testing procedure for units that represent a group of units. There are only two boilers at this site; therefore, group testing was not considered.

Section 6.4 discusses emission control plan (ECP). The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- By May 1, 2028, the owner or operator shall submit an Emission Control Plan (pursuant to section 6.4 of District Rule 4306 (12/17/20)) and Authority to Construct permit application identifying the steps to be taken to comply with the Tier 2-NOx and CO limits in Table 2 of District Rule 4306 (12/17/20) by December 31, 2029. [District Rule 4306]

Section 7.0 – Compliance Schedule

The boilers are expected to operate in compliance by the dates noted in the compliance schedules.

Compliance is expected with this Rule.

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

Section 2.0 - Applicability
Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a total rated heat input greater than 5 million Btu per hour.

The heat input rate to each fire-tube boiler (N-8234-10, '-11) is greater than 5 MMBtu/hr. Therefore, these units are subject to the requirements of this rule.

Section 5.0 – Requirements
Section 5.1 states that an operator of a unit(s) subject to this rule shall comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis:

- Operate the unit to comply with the emission limits specified in Sections 5.2 and 5.4; or

- Pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4; or

- Comply with the applicable Low-use Unit requirements of Section 5.5.

The facility had chosen to comply with this rule via paying annual emissions fee. The following condition will be included in each boiler permit to ensure on-going compliance with this section:

- Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the

previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

Section 5.4.1 requires to comply with one of particulate matter control requirement listed in below.

- Operators shall fire units exclusively on PUC-quality natural gas, commercial propane, butane, or liquefied petroleum gas, or a combination of such gases;
- Operators shall limit fuel sulfur content to no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet; or
- Operators shall install and properly operate an emission control system that reduces SO2 emissions by at least 95% by weight; or limit exhaust SO2 to less than or equal to 9ppmv corrected to 3.0% O2

Each boiler uses PUC quality natural gas fuel with maximum sulfur content of 1.0 gr-S/100 scf (equates to 0.00285 lb-SOx/MMBtu). The following conditions will be included in each boiler permit to ensure on-going compliance with this section:

- The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]

- SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rules 2201]

Section 5.6 states that the NO_x and CO emission limits shall not apply to this unit during start-up and shutdown period provided that the duration of each start-up or each shutdown is not greater than 2.0 hours, and the emission control system is utilized during these periods. The following conditions will be included in each boiler permit:

- Duration of each start-up or each shutdown shall not exceed 2.0 hours. [District Rules 4306 and 4320]

- The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rules 4306 and 4320]

Section 5.7 discusses monitoring provisions to comply with NO_x and CO limits. These provisions are similar to the provisions in Rule 4306 (discussed previously). Therefore, compliance is expected with this section.

Section 5.7.6 requires the operator to provide annual fuel sulfur content analysis. The following conditions will satisfy the requirements of this section:

- Fuel sulfur content shall be determined using EPA Method 11 or EPA Method 15. [District Rule 4320]

Section 5.8 discusses compliance determination. The requirements in this section are similar to the requirements in Rule 4306 (discussed previously). Therefore, compliance is expected with this section.

Section 6.0 – Administrative Requirements
Recordkeeping requirements of this Rule are similar to that of the Rule 4306. Please refer to section 6.0 of Rule 4306.

Section 7.0 – Compliance Schedule
The boilers are expected to operate in compliance with this rule.

Compliance is expected with this Rule.

District Rule 4351, Boilers, Steam Generators and Process Heaters-Phase 1

Since the emission limits of District Rule 4306 and 4320 and all other requirements are equivalent or more stringent than this Rule, compliance with District Rule 4306 and 4320 requirements will satisfy requirements of District Rule 4351.

District Rule 4601, Architectural Coatings

District Rule 4601 was last amended on April 16, 2020. EPA approved District Rule 4601 as amended on April 16, 2020 for inclusion in the SIP on December 14, 2022.

The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements. 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. 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 San Joaquin Valley Air Pollution Control District.

As required by a September 2016 decision by the U.S. Court of Appeals for the Ninth Circuit in *Bahr v. U.S. Environmental Protection Agency*,[1] the April 16, 2020 amendments to District Rule 4601 added a contingency measure for the District's 2016 Ozone Plan that would remove the exemption for specific categories of coatings sold in small containers with a volume of one liter or less if EPA issues a finding that the San Joaquin Valley Air Basin has failed to attain, or to make reasonable further progress towards attainment of, the 2008 National Ambient Air Quality Standard (NAAQS) for ozone. The April 16, 2020 amendments to District Rule 4601 implemented provisions of the 2019 California Air Resources Board (ARB) Suggested Control Measure for Architectural Coatings,[2] including lowering VOC limits for several categories of architectural coatings, setting VOC limits for three new categories of architectural coatings, and adding new requirements for colorants.

The primary effect of the April 16, 2020 amendments to District Rule 4601 was reducing VOC content limits required for specific categories of coatings and adding VOC content limits for specific categories of colorants. The previous VOC content limits of District Rule 4601 and the VOC content limits of coatings and colorants that became effective on and after January 1, 2022 are summarized below.

Section 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.

[1] United States Court of Appeals for the Ninth Circuit (September 12, 2016) Bahr v. U.S. Environmental Protection Agency. https://cdn.ca9.uscourts.gov/datastore/opinions/2016/09/12/14-72327.pdf
[2] California Air Resources Board (May 2019) California Air Resources Board (CARB) Suggested Control Measure for Architectural Coatings. https://ww2.arb.ca.gov/sites/default/files/2020-05/10602_scm_final.pdf

Rule 4601, Table 1 - VOC Content Limits for Coatings[1]		
COATING CATEGORY	**Previous VOC Limit (g/l)**	**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[2]	120	120
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

Rule 4601, Table 1 - VOC Content Limits for Coatings[1]		
COATING CATEGORY	**Previous VOC Limit (g/l)**	**VOC Limit (g/l) Effective on and after 1/1/2022**
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

1. Limits are expressed as VOC Regulatory (except where noted otherwise), thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.
2. Units are grams of VOC per liter of coating, including water and exempt compounds, in accordance with Section 3.72.

Rule 4601, Table 2 VOC Content Limits for Colorants[1]	
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

1. Limits are expressed as VOC Regulatory.

Conditions 23 through 25 in the proposed facility-wide permit N-8234-0-0 will ensure compliance with this rule.

District Rule 4701, Internal Combustion Engines – Phase 1

Since the applicable requirements in Rule 4702 are equivalent or more stringent than that of the Rule 4701, compliance with Rule 4702 requirements will satisfy requirements of Rule 4701.

District Rule 4702, Internal Combustion Engines

Section 2.0 - Applicability

This rule applies to any internal combustion engine rated at 25 brake horsepower or greater. The engine under permit N-8234-12 is rated at 270 bhp; therefore, this rule is applicable.

Section 4.0 – Exemptions
Pursuant to Section 4.3, except for the requirements of Section 6.2.3, the requirements of this rule shall not apply to an internal combustion engine that meets the following conditions:

- The engine is operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood; and

- Except for operations (stated above), the engine is limited to operate no more than 100 hours per calendar year as determined by an operational non-resettable elapsed time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine; and

- The engine is operated with an operational non-resettable elapsed time meter. In lieu of installing a non-resettable elapsed time meter, the operator of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA. The operator of the engine shall properly maintain and operate the non-resettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

The engine under permit N-8234-12 is used to preserve or protect property and human life in case of a fire at the facility. This engine will not be operated more than 100 hours per calendar year for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine. Furthermore, the engine will have operational non-resettable elapsed time meter. The following conditions in the permit ensures on-going compliance with this section:

- The engine shall be operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood. [District Rule 4702 and 17 CCR 93115]

- This engine shall be operated only for maintenance, testing, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all

maintenance, testing, and required regulatory purposes shall not exceed 30 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

- This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115]

Section 6.2 – Recordkeeping
Section 6.2.3 requires that an owner claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request. The records shall include, but are not limited to, the following:

- Total hours of operation,
- The type of fuel used,
- The purpose for operating the engine,
- For emergency standby engines, all hours of non-emergency and emergency operation shall be reported, and
- Other support documentation necessary to demonstrate claim to the exemption.

The following conditions in permit N-8234-12 ensure compliance with this section:

- The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]

- The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]

- All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

Compliance is expected with this Rule.

District Rule 4801, Sulfur Compounds

Section 3.1 states that a person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding a concentration of two-tenths (0.2) percent by volume calculated as sulfur dioxide (SO_2) at the point of discharge on a dry basis averaged over 15 consecutive minutes.

The dryers and RTOs under permit N-8234-4, '-5, '-6, boilers under permits N-8234-10 and '-11, and engine under permit N-8234-12 are subject to the requirements of this rule.

N-8234-4, '-5, '-6, '-10, '-11:
The dryers and RTOs use PUC quality natural gas fuel.

Rule 4801 limit of 0.2% equates to 2,000 ppmvd, and F-factor for natural gas combustion is 8,578 dscf/MMBtu at 60˚F. Using this data, SOx emissions in lb/MMBtu would be:

$$\mathrm{SOx}\left(\frac{\mathrm{lb}}{\mathrm{MMBtu}}\right)=\frac{(2{,}000\times10^{-6})\left(8{,}578\,\frac{\mathrm{dscf}}{\mathrm{MMBtu}}\right)\left(64\,\frac{\mathrm{lb\text{-}SO_x}}{\mathrm{lb\text{-}mol}}\right)}{\left(379.5\,\frac{\mathrm{dscf}}{\mathrm{lb\text{-}mol}}\right)}=2.9\,\frac{\mathrm{lb\text{-}SO_x}}{\mathrm{MMBtu}}$$

PUC quality natural gas contains a maximum of 1.0 gr-S/100 scf, which equates to 0.00285 lb-SOx/MMBtu[3]. Since SOx emissions are less than 2.9 lb/MMBtu, continued compliance is expected.

N-8234-12:
The engine uses ultra low sulfur (15 ppm by wt.) diesel fuel.

Rule 4801 limit of 0.2% equates to 2,000 ppmvd, and F-factor for diesel-fuel combustion is 9,051 dscf/MMBtu at 60˚F. Using this data, SOx emissions in lb/MMBtu would be:

[3] 1.0 gr-S/100 scf x 64.066 lb-SO_2/32.065 lb-S x scf/1,000 Btu x 10^6 Btu/MMBtu x lb-S/7,000 gr-S = 0.00285 lb-SO_2/MMBtu

$$\mathrm{SOx}\left(\frac{\mathrm{lb}}{\mathrm{MMBtu}}\right)=\frac{(2.000\times10^{-6})\left(9.051\ \frac{\mathrm{dscf}}{\mathrm{MMBtu}}\right)\left(64\frac{\mathrm{lb\text{-}SO_x}}{\mathrm{lb\text{-}mol}}\right)}{\left(379.5\frac{\mathrm{dscf}}{\mathrm{lb\text{-}mol}}\right)}=3.1\ \frac{\mathrm{lb\text{-}SO_x}}{\mathrm{MMBtu}}$$

The engine is required to use ultra low sulfur diesel fuel containing no more than 0.0015% by wt. sulfur, which equates to 0.00155 lb/MMBtu[4]. Since SOx emissions are less than 3.1 lb/MMBtu, continued compliance is expected.

District Rule 4309, <u>Dryers, Dehydrators, and Ovens</u>

Section 2.0 - Applicability

This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 million British thermal units per hour (5.0 MMBtu/hr) or greater.

Each pet food dryer under permit N-8234-4, '-5 and '-6 is rated at 10 MMBtu/hr. Thus, each dryer is subject to the requirements of this rule.

Section 5.0 - Requirements

Section 5.1 includes requirements for dehydrators. This section is not applicable to the pet food dryers.

Section 5.2 requires NOx and CO emissions shall not exceed any limits specified in Table 1. For each pet food dryer, limits are 4.3 ppmvd NOx @ 19% O2 and 42 ppmvd CO @ 19% O2 for gaseous fuel fired units.

The owner or operator is required to achieve 2.1 ppmvd NOx @ 19% O2 and 16.5 ppmvd CO @ 19% O2 for each dryer. The following condition in permits N-8234-4, '-5 and '-6 ensures on-going compliance with this section:

- Emissions from the dryer shall not exceed any of the following limits: 2.1 ppmvd NOx @ 19% O2 (0.024 lb-NOx/MMBtu), 16.5 ppmvd CO @ 19% O2 (0.112 lb-CO/MMBtu) and 0.00285 lb-SOx/MMBtu. [District Rules 2201 and 4309]

[4] 0.0015 lb-S/100 lb-fuel x 64.066 lb-SO_2/32.065 lb-S x 7.1 lb-fuel/gal x gal/0.137 MMBtu = 0.00155 lb-SO_2/MMBtu

Section 5.3 includes startup and shutdown provisions. Section 5.3.1 states units not equipped with NOx exhaust control system, duration of each start-up and each shutdown shall not exceed one hour.

The owner or operator has not requested to establish any startup or shutdown provisions for the dryers. Therefore, no such provision were included in the permits.

Section 5.4 includes monitoring requirements. Section 5.4.1 requires the uses one of the following techniques: install and maintain an APCO-approved CEMS for NOx and O2, or install and maintain an alternate emission monitoring method.

The owner or operator utilizes portable analyzer to measure NOx, CO and O2 concentrations on a monthly basis. This monitoring scheme satisfies the requirements of this section. The following conditions in permits N-8234-4, '-5 and '-6 ensures on-going compliance with this section:

- The permittee shall monitor and record the stack concentration of NOx, CO, and O2 of the dryer (at the exhaust stack of the MAC HE60 cyclone, upstream of the duct collecting discharge from other process streams), 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]

- If either the dryer 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]

Section 5.5 lists compliance determination criteria in sections 5.5.1 through 5.5.6. The following conditions in permits N-8234-4, '-5 and '-6 ensures on-going compliance with this section:

- 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 Rules 2201 and 4309]

- 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 Rules 2201 and 4309]

Section 6.0 - Administrative Requirements
Section 6.1 requires the operator to retain records of NOx and CO emissions. The records are required to be kept on-site for a period of five years. The following conditions in permits N-8234-4, '-5 and '-6 ensures on-going compliance with this section:

- The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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]

- All records shall be maintained and retained on-site for minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4309]

Section 6.2 includes various test methods. The following condition(s) in permits N-8234-4, '-5 and '-6 ensures on-going compliance with this section:

- NOx 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 2201 and 4309]

- CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 2201 and 4309]

- Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2201 and 4309]

Section 6.3 lists compliance demonstration criteria in section 6.3.1 through 6.3.9. The following conditions in permits N-8234-4, '-5 and '-6 ensures on-going compliance with this section:

- Source testing to determine NOx and CO emissions from the dryer at the exhaust stack of the MAC HE60 cyclone by obtaining samples upstream of the duct collecting discharge from other process streams shall be conducted at least once every 24 months. [District Rule 4309]

- Source testing to determine NOx and CO emissions from the dryer at the exhaust stack of the MAC HE60 cyclone by obtaining samples upstream of the duct collecting discharge from other process streams shall be conducted within 180 days of initial startup and at least once every 24 months. [District Rule 4309]

- 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 Rules 1081 and 4309]

- 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 Rules 2201 and 4309]

- All dryer 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]

- 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 2201 and 4309]

Section 7.0 – Compliance Schedule
This section list compliance schedule for existing units subject to the requirements of this rule. The dryers are expected to be operated in compliance with the requirements this rule.

Compliance is expected with this rule.

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

§93115.5 - Fuel and Fuel Additive Requirements for New and In-Use Stationary CI Engines That Have a Rated Brake Horsepower of Greater than 50 (>50 bhp)
Section (b) states that as of January 1, 2006, except as provided for in section 93115.3, no owner or operator of an in-use emergency standby stationary diesel-fueled CI engine shall add to the engine or any fuel tank directly attached to the engine any fuel unless the fuel is one of the following:

(1) CARB Diesel Fuel; or
(2) an alternative diesel fuel that is:
    (A) biodiesel;
    (B) a biodiesel blend that does not meet the definition of CARB Diesel Fuel;
    (C) a Fischer-Tropsch fuel; or
    (D) an emulsion of water in diesel fuel; or
(3) any alternative diesel fuel that is not identified in section 93115.5(b)(2) above and meets the requirements of the Verification Procedure; or
(4) an alternative fuel; or
(5) CARB Diesel Fuel used with fuel additives that meets the requirements of the Verification Procedure; or
(6) any combination of 93115.5(b)(1) through (5) above.

The 270 bhp diesel-fueled fire pump engine (N-8234-12) is an “in-use” emergency standby stationary engine. This engine is required to use CARB diesel fuel. The following condition ensure on-going compliance with this section:

- 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]

§93115.6 Emergency Standby Diesel-Fueled CI Engine (>50 bhp) Operating Requirements and Emission Standards
Section (b) includes In-Use Emergency Standby Diesel-Fueled CI Engine (> 50 bhp) Operating Requirements and Emission Standards.

(1) No owner or operator shall operate any in-use stationary emergency standby diesel-fueled CI engine in response to the notification of an impending rotating outage unless all the following criteria are met:

(A) the engine's permit to operate allows operation of the engine in anticipation of a rotating outage, or the District has established a policy or program that authorizes operation of the engine in anticipation of a rotating outage; and

(B) the Utility Distribution Company has ordered rotating outages in the control area where the engine is located, or has indicated it expects to issue such an order at a certain time; and

(C) the engine is located in a specific location that is subject to the rotating outage; and

(D) the engine is operated no more than 30 minutes prior to the time when the Utility Distribution Company officially forecasts a rotating outage in the control area; and

(E) the engine operation is terminated immediately after the Utility Distribution Company advises that a rotating outage is no longer imminent or in effect.

The engine under permit N-8234-12 provides mechanical power to a fire pump assembly. The engine is not intended to operate during electrical outages. Therefore, this section is not applicable.

(2) At-School and Near-School Provisions. No owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine for non-emergency use, including maintenance and testing, during the following periods:

(A) whenever there is a school sponsored activity, if the engine is located on school grounds, and

(B) between 7:30 a.m. and 3:30 p.m. on days when school is in session, if the engine is located within 500 feet of school grounds. Section 93115.6(b)(2) does not apply if the engine emits no more than 0.01 g/bhp-hr of diesel PM.

The engine under permit N-8234-12 is not located on school grounds or within 500 feet of school ground. Therefore, this section is not applicable.

(3) Except as provided in section 93115.3, no owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine (> 50 hp) in California unless it meets, in accordance with the applicable compliance schedules specified in sections 93115.11 and 93115.12, the following requirements (which are summarized in Table 3).

(A) Diesel PM Standard and Hours of Operation Limitations.

1. General Requirements:

   a. No owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine (>50 bhp) that emits diesel PM at a rate greater than 0.40 g/bhp-hr more than 20 hours per year for maintenance and testing purposes. The District may approve up to 20 additional hours per year for the maintenance and testing of such in-use emergency standby diesel-fueled CI engines operated at health facilities. This subsection does not limit engine operation for emergency use and for emission testing to show compliance with 93115.6(b)(3).
   b. No owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine (>50 bhp) that emits diesel PM at a rate less than or equal to 0.40 g/bhp-hr more than 30 hours per year for maintenance and testing purposes, except as provided in 93115.6(b)(3)(A)2. This subsection does not limit engine operation for emergency use and for emission testing to show compliance with 93115.6(b)(3).

   The engine under permit N-8234-12 is permitted at diesel PM emission rate of 0.25 g/bhp-hr. Therefore, this engine will be limited to operate for up to 30 hours per year for maintenance and testing purpose. The following condition ensures compliance with this section:

   - This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 30 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

2. The District may allow in-use stationary emergency standby diesel-fueled CI engines (> 50 bhp) to operate more than 30 hours per year for maintenance and testing purposes on a site-specific basis, provided the following limits are met:

a. Up to 40 annual hours of operation are allowed for maintenance and testing purposes at a health facility if the diesel PM emission rate is greater than 0.15 g/bhp-hr but less than or equal to 0.40 g/bhp-hr.
b. Up to 50 annual hours of operation are allowed for maintenance and testing purposes if the diesel PM emission rate is less than or equal to 0.15 g/bhp-hr.
c. Up to 100 annual hours of operation are allowed for maintenance and testing purposes if the diesel PM emission rate is less than or equal to 0.01 g/bhp-hr.

The diesel PM emission rate is 0.25 g/bhp-hr from the engine under permit N-8234-12. This engine is not located at a health facility, and therefore, the engine does not quality any of the above criteria.

(B) Additional Standards:
Owners or operators that choose to meet the diesel PM standards defined in section 93115.6(b)(3)(A) with emission control strategies that are not verified through the Verification Procedure shall either:

1. Meet the applicable HC, NOx, NMHC+NOx, and CO standards for off-road engines of the same model year and maximum rated power as specified in the Off-Road Compression Ignition Engine Standards (title 13, CCR, section 2423). If no standards have been established for an off-road engine of the same model year and maximum rated power as the in-use stationary emergency standby diesel-fueled CI engine, then the in-use stationary emergency standby diesel-fueled CI engine shall meet the Tier 1 standards in title 13, CCR, section 2423 for an off-road engine of the same maximum rated power, irrespective of the in-use stationary emergency standby diesel-fueled CI engine's model year; Or

2. Not increase CO emission rates by more than 10% above baseline; and
   Not increase HC or NOx emission rates by more than 10% above baseline; or
   Not increase the sum of NMHC and NOx emission rates above baseline.

PM emission rate (0.25 g/bhp-hr) from the engine under permit N-8234-12 are listed in Table 3 of Section 93115.6(b)(3). These emission rates are based on the engine testing and were provided by the engine manufacturer (refer to District project N-991069. Therefore, the engine is not required to meet the additional standards to demonstrate compliance with diesel PM standard.

(C) The District:
1. may establish more stringent diesel PM, NMHC+NOx, HC, NOx, and CO emission rate standards; and
2. may establish more stringent limits on hours of maintenance and testing on a site-specific basis; and
3. shall determine an appropriate limit on the number of hours of operation for demonstrating compliance with other District rules and initial start-up testing.

The emission rates for the engine in permit N-8234-12 are based on the engine's manufacturer data. No additional standards are established for in-use emergency fire-pump engines.

§93115.10 – Recordkeeping, Reporting, and Monitoring Requirements
Pursuant to section (f), starting January 1, 2005, each owner or operator of an emergency standby diesel-fueled CI engine shall keep records and prepare a monthly summary that shall list and document the nature of use for each of the following:

a. Emergency use hours of operation;
b. Maintenance and testing hours of operation;
c. Hours of operation for emission testing;
d. Initial start-up hours; and
e. If applicable, hours of operation to comply with the testing requirements of NFPA 25
f. Hours of operation for all uses other than those specified in sections 'a' through 'd' above; and
g. If applicable, DRP (Demand Response Program) engine hours of operation, and
h. The fuel used.

The following conditions in permit N-8234-12 ensures on-going compliance with this section:

- The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]

- 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 4702, 17 CCR 93115 and 40 CFR Part 63 Subpart ZZZZ]

Compliance is expected with this regulation.

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires CAM for units that meet the following three criteria:

1. Unit must have an emission limit for the pollutant;
2. 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. Unit must have a pre-control potential to emit of greater than the major source thresholds given below:

   NOx: 20,000 lb/yr
   SOx: 140,000 lb/yr
   PM_{10}: 140,000 lb/yr
   CO: 200,000 lb/yr
   VOC: 20,000 lb/yr

N-8234-1: Pet Food Material Receiving, Storage & Loadout Operations
This permit unit has emission limit for PM10, and the unit is equipped with an add-on control devices (baghouse, cartridge dust collector, etc.). This unit may be subject to CAM requirements for PM10 if the pre-control potential to emit of this permit unit is greater than the major source threshold of 140,000 lb-PM10/year.

A baghouse is expected to provide 99% control of PM10 emissions. The pre-control potential to emit for this unit will be calculated using the permitted process rate of 380,000 tons/yr and the PM10 emission factor of 0.0015 lb/ton-material as follows:

PE (pre-control) = (0.0015 lb-PM10/ton x 380,000 tons/yr) ÷ (1 – 0.99)
= 57,000 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this unit is not subject to CAM requirements.

N-8234-2: Pet Food Material Dispensing, Conveying & Storage Operations
This permit unit has emission limit for PM10, and the unit is equipped with an add-on control devices (cartridge dust collectors). This unit may be subject to CAM requirements for PM10 if the pre-control potential to emit of this permit unit is greater than the major source threshold of 140,000 lb-PM10/year.

A cartridge dust collector is expected to provide 99% control of PM10 emissions. The pre-control potential to emit for this unit will be calculated using the permitted process rate of 280,000 tons/yr and the PM10 emission factor of 0.00025 lb/ton-material as follows:

PE (pre-control) = (0.00027 lb-PM10/ton x 280,000 tons/yr) ÷ (1 – 0.99)
= 7,560 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this unit is not subject to CAM requirements.

N-8234-3: Pet Food Material Dispensing, Mixing, Grinding, Screening & associated Conveying Operations
This permit unit has emission limit for PM10, and the unit is equipped with an add-on control devices (baghouses, cartridge dust collectors, etc.). This unit may be subject to CAM requirements for PM10 if the pre-control potential to emit of this permit unit is greater than the major source threshold of 140,000 lb-PM10/year.

A baghouse or cartridge dust collector is expected to provide 99% control of PM10 emissions. The pre-control potential to emit for various operations will be calculated using the permitted process rate and emission factors as follows:

Hammermill systems:
PE (pre-control) = (0.021 lb-PM10/ton x 1,100 tons/day x 365 days/yr) ÷ (1 – 0.99)
= 843,150 lb-PM10/yr

Since the pre-control PM10 emissions are greater than the major source threshold of 140,000 lb-PM10/year, this unit is subject to CAM requirements for PM10. Since the post-control emissions (8,432 lb-PM10/year) are less than the Major Source Threshold, only daily monitoring is required by CAM.

Each baghouse serving a hammermill is required to be equipped with a pressure differential gauge to monitor the pressure drop across the filter media. The operator is required to record the baghouse pressure differential on a daily basis.

The following conditions ensure compliance with CAM requirements:

- Each baghouse serving a hammermill shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64]

- The differential pressure gauge reading range shall be established within 60 days of issuance date on this permit. [40 CFR Part 64]

- The differential pressure gauge shall operate within the established range during normal baghouse operation. Baghouse service is required when the differential pressure approaches the upper level bound of the established pressure reading. After baghouse service, pressures may be drop below the lowest level of the established reading until sufficient loading of the filter media has occurred. [40 CFR Part 64]

- During each day the baghouse operates, the permittee shall monitor and record the differential pressure of the baghouse and compare the reading with the permitted range. If the baghouse differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the differential pressure 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 within 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 within in the permitted range. [40 CFR Part 64]

- Records of baghouse maintenance, inspections, and repair shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [40 CFR Part 64]

Truck loadout operation:

PE (pre-control) = (0.0009 lb-PM10/ton x 800 tons/day x 365 days/yr) ÷ (1 – 0.99)
= 26,280 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this operation is not subject to CAM requirements.

Material handling and transfer operations:
PE (pre-control) = (0.0003 lb-PM10/ton x 1,100 tons/day x 365 days/yr) ÷ (1 – 0.99)
= 12,045 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this operation is not subject to CAM requirements.

N-8234-4: Pet Food Processing Line #1
N-8234-5: Pet Food Processing Line #2
N-8234-6: Pet Food Processing Line #3
Each pet food line is identical.

The exhaust from various emission sources, such as, dryer cyclone, dryer cooler cyclone, hot-kibble conveying cyclone (wet cyclone), vertical cooler cyclone in each pet food line are released into a common header. This header then splits the exhaust into three regenerative thermal oxidizers.

These RTOs reduce VOC emissions as well as other odorous compounds. Therefore, VOC emitting units may become subject to CAM requirements only if the pre-control potential emissions are greater than the major source threshold of 20,000 lb-VOC/year. VOC emissions from individual unit (such as dryer, dryer cooler, etc.) are unknown; therefore, combined total VOC (post-control) emission at the exhaust of RTO is used.

The pre-control VOC emissions are estimated using the permitted process VOC emissions factor, production rate and control efficiency as follows:

PE (pre-control) = (0.005 lb-VOC/ton of material produced x 780 tons/day x 365 days/yr) ÷ (1 – 0.95)
= 28,470 lb-VOC/yr

Since the pre-control VOC emissions are greater than the major source threshold of 20,000 lb-VOC/year, VOC emitting units are subject to CAM requirements for VOC. Since the post-control emissions are less than the Major Source Threshold, only daily monitoring is required for CAM.

The following conditions ensure compliance with CAM requirements:

- Each RTO's combustion chamber temperature shall be maintained at or above 1650 degrees Fahrenheit whenever odor abatement is occuring in the specific RTO. [District Rule 2201 and 40 CFR Part 64]

- Each RTO's chamber shall be permanently equipped with temperature measurement devices to determine the average combustion chamber temperature. The combustion temperature shall be continuously monitored and recorded at least every 15-minutes whenever odor abatement is occuring in the specific RTO. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established RTO combustion chamber temperature. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201 and 40 CFR Part 64]

N-8234-7: Thiele Packaging Line 1
This permit unit has emission limit for PM10, and the unit generating PM is equipped with an add-on control devices (bin vent filter system). This unit may be subject to CAM requirements for PM10 if the pre-control potential to emit of this permit unit is greater than the major source threshold of 140,000 lb-PM10/year.

A bin vent filter system is expected to provide 99% control of PM10 emissions. The pre-control potential to emit will be calculated using the permitted process rate and emission factors as follows:

PE (pre-control) = (0.0011 lb-PM10/ton x 1,200 tons/day x 365 days/yr) ÷ (1 – 0.99)
= 48,180 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this operation is not subject to CAM requirements.

N-8234-8: Thiele Packaging Line 2
This permit unit has emission limit for PM10, and the unit generating PM is equipped with an add-on control devices (bin vent filter system). This unit may be subject to CAM requirements for PM10 if the pre-control potential to emit of this permit unit is greater than the major source threshold of 140,000 lb-PM10/year.

A bin vent filter system is expected to provide 99% control of PM10 emissions. The pre-control potential to emit will be calculated using the permitted process rate and emission factors as follows:

PE (pre-control) = (0.0011 lb-PM10/ton x 1,200 tons/day x 365 days/yr) ÷ (1 – 0.99)
= 48,180 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this operation is not subject to CAM requirements.

N-8234-9: UVA Packaging Line 3
This permit unit has emission limit for PM10, and the unit generating PM is equipped with an add-on control devices (bin vent filter system). This unit may be subject to CAM requirements for PM10 if the pre-control potential to emit of this permit unit is greater than the major source threshold of 140,000 lb-PM10/year.

A bin vent filter system is expected to provide 99% control of PM10 emissions. The pre-control potential to emit will be calculated using the permitted process rate and emission factors as follows:

PE (pre-control) = (0.0011 lb-PM10/ton x 1,200 tons/day x 365 days/yr) ÷ (1 – 0.99)
= 48,180 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this operation is not subject to CAM requirements.

N-8234-10: 14.65 MMBtu/hr natural gas-fired boiler with SCR system
N-8234-11: 14.65 MMBtu/hr natural gas-fired boiler with SCR system
Each permit unit has emission limits for NOx, SO_X, PM_{10}, CO and VOC. Each unit is equipped with a selective catalytic reduction (SCR) system to reduce NOx emissions. Therefore, each unit may be subject to CAM requirements for NOx only if the pre-control potential emissions are greater than the major source threshold of 20,000 lb-NOx/year.

Per EPA's Air Pollution Control Technology Fact Sheet, EPA-452/F-03-032[5], SCR system is capable of NOx reduction efficiencies in the range of 70% to 90%. The pre-control potential to emit are estimated using 90% control efficiency, the permitted NOx emission factor of 0.011 lb/MMBtu and heat input rate of 128,334 MMBtu/yr[6] as follows:

PE (pre-control) = (0.011 lb-NOx/MMBtu x 128,334 MMBtu/yr) ÷ (1 – 0.90)
= 14,117 lb-NOx/yr

[5] https://www3.epa.gov/ttncatc1/dir1/fscr.pdf
[6] The combined total heat input rate for boilers N-8234-10 and '-11 is limited to 128,334 MMBtu per year. For conservative calculations, it is presumed that single boiler can accommodate this heat input rate (14.65 MMBtu/hr x 8760 hr/yr = 128,334 MMBtu/yr)

For each boiler, the pre-control NOx emissions are less than the major source threshold of 20,000 lb-NO_X/year. Therefore, these units are not subject to CAM requirements.

N-8234-12: 270 bhp diesel-fired emergency fire pump engine
This unit is not equipped with any add-on emissions control equipment; therefore, CAM is not required.

N-8234-14: Thiele Packaging Line 4
This permit unit has emission limit for PM10, and the unit generating PM is equipped with an add-on control devices (bin vent filter system). This unit may be subject to CAM requirements for PM10 if the pre-control potential to emit of this permit unit is greater than the major source threshold of 140,000 lb-PM10/year.

A bin vent filter system is expected to provide 99% control of PM10 emissions. The pre-control potential to emit will be calculated using the permitted process rate and emission factors as follows:

PE (pre-control) = (0.0011 lb-PM10/ton x 1,200 tons/day x 365 days/yr) ÷ (1 – 0.99)
= 48,180 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this operation is not subject to CAM requirements.

N-8234-19: Centralized Vacuum Cleaning System
This permit unit has emission limit for PM10, and the unit generating PM is equipped with an add-on control devices (dust filtration system). This unit may be subject to CAM requirements for PM10 if the pre-control potential to emit of this permit unit is greater than the major source threshold of 140,000 lb-PM10/year.

A dust filtration system is expected to provide 99% control of PM10 emissions. The pre-control potential to emit will be calculated using the permitted data follows:

PE (pre-control) = (0.0004 gr-PM10/dscf x 1,550 scf/min x 60 min/hr x 8,760 hr/yr x lb/7000 gr) ÷ (1 – 0.99)
= 4,655 lb-PM10/yr

Since the pre-control PM10 emissions are less than the major source threshold of 140,000 lb-PM10/year, this operation is not subject to CAM requirements.

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

By using the model general permit template(s) listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template(s). The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

The model general permit template contains requirements related to the permit shields. Therefore, no further discussion is necessary.

XI. PERMIT CONDITIONS

See Attachment A – Draft Title V Operating Permit.

XII. ATTACHMENTS

A. Draft Title V Operating Permit
B. Detailed Facility List
C. Exempt Equipment
D. Permits to Operate
E. HAP Calculations

ATTACHMENT A

Draft Title V Operating Permit

FACILITY: N-8234-0-0 **EXPIRATION DATE:** 04/30/2025

DRAFT

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 San Joaquin 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 San Joaquin County Rule 110] 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. {4365} 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 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

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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

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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, 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 of District Rule 4601 (4/16/20), after the specified effective dates in Table 1 or Table 2 of District Rule 4601. [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

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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. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: San Joaquin County Rule 401, San Joaquin County, Rule 110, and San Joaquin County Rule 202. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

42. On (Enter TV issuance date), the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, 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

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-1-3 **EXPIRATION DATE:** 04/30/2025

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EQUIPMENT DESCRIPTION:
PET FOOD MATERIAL RECEIVING, STORAGE, AND LOAD OUT OPERATION

PERMIT UNIT REQUIREMENTS

1. Receiving Equipment: Two rail car receiving pits (pit #1 and pit #2), one truck receiving pit (pit #3), four enclosed screw conveyors, two Prater scalpers, two enclosed belt conveyors, and two enclosed bucket elevators each feeding enclosed drag A and B screw conveyors. The rail car receiving pit (pit #1) and the truck receiving pit (pit #3) delivers the product to the enclosed screw conveyor from where the material transfers into a Prater scalper. The accepts from the scalper transfer to another enclosed screw conveyor to an enclosed belt conveyor that delivers the material into an enclosed bucket elevator (leg #2) feeding enclosed drag A and B screw conveyors that fills the silos and or bins mentioned in the storage equipment (below). The railcar receiving pit (pit #2) has a conveying mechanism set up identical to the rail car receiving pit (pit #1) and the truck receiving pit (pit #3). The rail car receiving pit (#1) and the truck pit (#3) uses a bucket elevator (leg #1). The rail car receiving pit (2) uses a bucket elevator (leg #2). Each receiving pit shall have a choke feed system. The rail car receiving pit (#1), the truck receiving pit (#3), Prater scalper, the bucket elevator (leg #1) all shall be vented to a CAMCORP Model 10TR10x100 baghouse. The rail car receiving pit (#2), Prater scalper, the enclosed elevators and the bucket elevator (leg #2) all shall be vented to another CAMCORP Model 10TR10x100 baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Storage Equipment: Three 21,430 cubic feet each approx. 21.5' dia, 58.8' side wall silos and six 2,560 cubic feet each approx. 8' x 8' x 40' side wall in storage area A being fed by drag A enclosed screw conveyor, three 21,430 cubic feet each approx. 21.5' dia, 58.8' side wall and six 2,560 cubic feet each approx. 8' x 8' x 40' side wall in storage area B being fed by drag B enclosed screw conveyor. Each silo and bin shall be equipped with HORIZON SYSTEMS Model 21VFTC6 (or equal) cartridge dust collector system. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The truck loadout spout shall have a sock filter to minimize entrainment of material dust into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter, at exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) 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
6. The total PM10 emissions from this permit unit shall not exceed 0.0015 pounds per ton of material received or loaded out. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The combined amount of material received and loaded out shall not exceed 1,200 tons/day and 380,000 tons/year (12-month rolling basis). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The owner or operator shall keep record of the date, amount of material received (in tons), and amount of material loaded out (in tons). [District Rule 2201] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. The owner or operator shall keep monthly records of the total material received and loaded out under this permit. These monthly records shall be used to determine compliance with annual processing rate limit on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit

10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-2-7 **EXPIRATION DATE:** 04/30/2025

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EQUIPMENT DESCRIPTION:
PET FOOD MATERIAL DISPENSING, CONVEYING AND STORAGE OPERATIONS

PERMIT UNIT REQUIREMENTS

1. Dispensing System: The material in three 21,430 cubic feet (each) silos in storage area A (East) shall be dispensed via enclosed reversible screw conveyors into enclosed drag conveyor(s) A-3 or A-4. The material in six 2,560 cubic feet (each) bins in storage area A (East) shall be dispensed into enclosed belt conveyor C. The material in three 21,430 cubic feet (each) silos in storage area B (West) shall be dispensed via enclosed reversible screw conveyors into enclosed drag conveyor(s) A-1 or A-2 and then dispensed into enclosed belt conveyor D. The material in six 2,560 cubic feet (each) bins in storage area B (West) is dispensed from the bins directly to the mill tower via enclosed transfer drag conveyor C or D. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Conveying and Storage System: Enclosed drag conveyors C and D transfer material into enclosed bucket elevators (leg #3, leg #4, respectively) that feed any of the 75 bins in the mill tower. The enclosed bucket elevators (leg #3, leg #4), associated drag conveyors, and each mill tower bin shall be equipped with Horizon Systems Model 21VFTC6 (or equal) cartridge dust collector systems. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All exhaust stacks under this permit shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Visible emissions at the exhaust of each dust collector system 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
6. PM10 emissions from material transfer and storage operations covered under this permit shall not exceed 0.00027 pounds per ton of material stored. [District Rule 2201] Federally Enforceable Through Title V Permit
7. No more than 1,100 tons/day and 280,000 tons/year (12-month rolling basis) of total material that is dispensed from outdoor silos/bins shall be transferred to storage bins in the mill tower. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The owner or operator shall keep daily records of the total material transferred to storage bins in the mill tower. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The owner or operator shall keep monthly records of the total material transferred to storage bins in the mill tower. These monthly records shall be used to determine compliance with annual processing rate limits on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-3-5 **EXPIRATION DATE:** 04/30/2025

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EQUIPMENT DESCRIPTION:
PET FOOD MATERIAL DISPENSING, MIXING, GRINDING AND SCREENING, EXTRUSION SURGE BINS, AND ASSOCIATED CONVEYING OPERATIONS

PERMIT UNIT REQUIREMENTS

1. Dispensing System: The material is dispensed from the bins in the mill tower to their associated scale bins. There are 4 scale bins located under the 75 bins. Each scale services approximately 25% of the bins in the mill tower. The four scale bins dispense into a six ton dual ribbon mixer described in item the condition below. Each scale bin shall be equipped with HORIZON SYSTEMS Model 21VFTC6 (or equal) cartridge dust collector system. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Mixing and Conveying System: The material in the 4 scale bins is dispensed into an enclosed six ton dual ribbon mixer. There is one mixer surge bin with a connected screw conveyor that transfers the material into another screw conveyor served by HORIZON SYSTEMS MODEL 21VFTC6 (or equal) dust collector system that either transfers the material into an enclosed bucket elevator feeding an enclosed transfer auger or a portion of the material into a truck loadout spout. The enclosed transfer auger feeds four surge bins one associated with each hammer mill. Each surge bin shall be equipped with HORIZON SYSTEMS MODEL 21VFTC6 (or equal) dust collector system. The truck loadout spout distributes product into a turn-head that services 4 unloading bins. Each unloading bin is vented with HORIZON SYSTEMS Model 21VFTC6 (or equal) dust collector system. The loadout spout of each unloading bin shall have an extended rubber sleeve to minimize entrainment of material dust into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Grinding, Screening, and Conveying System: There are four identical hammermill systems. Each system consists of a hammer mill feeding system, a hammermill, a hammermill plenum, and an enclosed screw conveyor. Each hammermill/plenum shall be equipped with MAC LST AIR 96LST196 (or equal) baghouse. The ground material from each hammermill system shall be pneumatically transferred using a filter receiver system into four sets of a paired extruder surge bin system (mentioned in the condition below). The displaced air from the filter receiver system shall be vented through a HORIZON SYSTEMS 40SWRDL 16 (or equal) baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Extruder Surge Bins: Four sets of identical extruder surge bins, each set contains two bins, each with dimensions approx. 8' x 8' x 20', and each bin shall be equipped with HORIZON SYSTEMS MODEL 21VFTC6 (or equal) cartridge dust collector system. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Particulate matter, at exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. All exhaust stacks under this permit 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]
7. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) 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
8. PM10 emissions from each hammermill system shall not exceed 0.021 pounds per ton of material processed. [District Rule 2201] Federally Enforceable Through Title V Permit

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9. The amount of material processed through each hammermill system shall not exceed 1,100 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The total material processed through all four hammermill systems shall not exceed 1,100 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions from the truck loadout operation shall not exceed 0.0009 pounds per ton of material loaded into trucks. [District Rule 2201] Federally Enforceable Through Title V Permit
12. No more than 800 tons of material shall be loaded into trucks using truck loadout spout in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM10 emissions from the material handling and transfer operations (except for material handling during truck loadout operations) shall not exceed 0.0003 pounds per ton of material handled. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The total material handled & transferred by the operations covered under this permit shall not exceed 1,100 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall keep records of the date, the amount of total material processed in hammermill systems, and the amount of material loaded into trucks. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Each baghouse serving a hammermill shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64] Federally Enforceable Through Title V Permit
17. The differential pressure gauge reading range shall be established within 60 days of issuance date on this permit. [40 CFR Part 64] Federally Enforceable Through Title V Permit
18. The differential pressure gauge shall operate within the established range during normal baghouse operation. Baghouse service is required when the differential pressure approaches the upper level bound of the established pressure reading. After baghouse service, pressures may be drop below the lowest level of the established reading until sufficient loading of the filter media has occurred. [40 CFR Part 64] Federally Enforceable Through Title V Permit
19. During each day the baghouse operates, the permittee shall monitor and record the differential pressure of the baghouse and compare the reading with the permitted range. If the baghouse differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the differential pressure 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 within 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 within in the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
20. Records of baghouse maintenance, inspections, and repair shall be maintained. The records shall include identification of 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
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-4-14 **EXPIRATION DATE:** 04/30/2025

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EQUIPMENT DESCRIPTION:
PET FOOD PROCESSING LINE #1

PERMIT UNIT REQUIREMENTS

1. Particulate matter, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All exhaust stacks under this permit 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. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Material Dispensing, Kibble Manufacturing, and Conveying Systems: The material from the extruder surge bin is dispensed into an extruder bin from where the material is transferred into an EXTRU-TECH 24X144 steam-conditioner system. The material is extruded to form kibbles. The kibbles are pneumatically conveyed using HEPA filtered air into a dryer receiving chamber using HORIZON SYSTEMS HT-68 high volume cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the wet cyclone (Horizon HT-68) into the duct connected to the RTO. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
5. Dryer System: The system consists of an EXTRU-TECH 1053-2P-AF11, 10 MMBtu/hr (total) direct-fired natural gas fired dryer with five drying sections, each section is equipped with an ECLIPSE WINNOX WX0200 burner with a maximum heat input rate of 2.0 MMBtu/hr. The dryer exhaust is vented to a MAC HE60 high efficiency cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the dryer cyclone (MAC HE60) into the duct connected to the RTO. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
6. Cooler and Conveying System: The system consists of three cooler sections, all vented to a MAC high efficiency cyclone, a discharge conveyor for the transfer of dried kibbles into a hopper. The material from the hopper is pneumatically conveyed to an enclosed shaker screener. The owner or operator shall install and maintain a duct work to re-circulate the exhaust from the dryer cooler cyclone (MAC) into the Dryer System. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
7. Fines Collection and Conveying System: This system collects fines from two locations in the dryer, the dryer cyclone discharge, and the cooler cyclone discharge, and vents these fines to a HORIZON SYSTEMS 28S WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Screening and Conveying System. The system consists of an enclosed shaker screener, an enclosed surge bin, and an enclosed weigh belt. The fines (rejects) are dropped to the dumpsters. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Coating and Conveying System: The system consists of a hopper where material from a weight belt is sprayed with chicken fat and canola oil (or other similar ingredients) and a coating reel where dry dog/cat digest and probiotics (or other similar ingredients) are sprinkled to be absorbed into the kibbles. The kibbles are then conveyed pneumatically to a vertical cooler system using a filter receiver system with a static sock filter. [District Rule 2201] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Vertical Cooler and Conveying System: A vertical cooler vented to a MAC HE52 high efficiency cyclone. The dried material falls on a vibratory pan on sliding rails. The material (accepts) from the vibratory pan drops into a hopper from where the dried kibbles are pneumatically conveyed to the finished product bins. Each bin shall be vented to a static sock filter. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to a barrel. The owner or operator shall install and maintain a duct work to discharge exhaust from the vertical cooler cyclone (MAC HE 52) into the duct connected to the RTO. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
11. The owner or operator shall install, operate and maintain three identical Durr Systems, Inc.'s Ecopure RL-60 regenerative thermal oxidizers (RTO) each equipped with 7.7 MMBtu/hr burner, associated duct work and control equipment, to abate pet food odors and reduce VOC emissions from all pet food manufacturing lines discharge stacks (wet cyclone (Horizon HT-68), dryer cyclone (MAC HE60) and vertical cooler cyclone (MAC HE52)). [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
12. Each RTO shall be equipped with non-resettable fuel flow meter(s) to measure natural gas fuel flow into each RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Each RTO's combustion chamber temperature shall be maintained at or above 1650 degrees Fahrenheit whenever odor abatement is occuring in the specific RTO. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. Each RTO's chamber shall be permanently equipped with temperature measurement devices to determine the average combustion chamber temperature. The combustion temperature shall be continuously monitored and recorded at least every 15-minutes whenever odor abatement is occuring in the specific RTO. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established RTO combustion chamber temperature. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
15. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) 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
16. The dryer and RTO(s) shall only be fired on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM10 emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.0306 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The post control VOC emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.005 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
19. No more than 36 tons of fresh meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The combined amount of finished product produced through all pet food manufacturing lines (N-8234-4, '-5 and '-6) shall not exceed 780 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Emissions from the dryer shall not exceed any of the following limits: 2.1 ppmvd NOx @ 19% O2 (0.024 lb-NOx/MMBtu), 16.5 ppmvd CO @ 19% O2 (0.112 lb-CO/MMBtu) and 0.00285 lb-SOx/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

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23. The RTO(s) shall reduce the VOC emissions (not including VOC emissions from natural gas combustion in the RTO) from pet food manufacturing operations by at least 95% (by weight). [District Rule 2201] Federally Enforceable Through Title V Permit

24. The total NOx emissions from the three RTO unit system and three dryers combined shall not exceed any of the following limits: 8.343 lb/hr and 200.4 lb/day and 33,639 lb/yr (12-month rolling basis). Compliance with these mass emission rates shall be demonstrated using NOx (ppmvd) and exhaust gas flow rate (Q, dry standard cubic feet per minute, dscfm) data recorded by the CERMS, according to the following equation: Emissions (lb/hr) = (NOx ppmvd x 46 lb/lb-mol x 60 min/hr x Q (dscfm)) ÷ (379.5 dscf/lb-mol x 1000,000). Daily emissions for each RTO shall be calculated by summing the hourly emissions for the respective calendar day. Hourly or daily emissions data shall be used to calculate monthly emissions. Monthly data shall be used to calculate rolling 12-month totals. [District Rule 2201] Federally Enforceable Through Title V Permit

25. Emissions due to natural gas combustion in each RTO shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.88 lb-CO/MMBtu and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Heat input rate to each RTO shall not exceed any of the following limits: 184.8 MMBtu/day and 67,082 MMBtu/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit

27. Combined total heat input rate to all three RTOs shall not exceed 156,816 MMBtu/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit

28. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 of the dryer (at the exhaust stack of the MAC HE60 cyclone, upstream of the duct collecting discharge from other process streams), 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

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 Rules 2201 and 4309] Federally Enforceable Through Title V Permit

30. If either the dryer 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

31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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

32. 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

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33. 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

34. 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 Rules 2201 and 4309] Federally Enforceable Through Title V Permit

35. 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 1081, 2201 and 4309] Federally Enforceable Through Title V Permit

36. Source testing to determine NOx and CO emissions from the dryer at the exhaust stack of the MAC HE60 cyclone by obtaining samples upstream of the duct collecting discharge from other process streams shall be conducted at least once every 24 months. [District Rule 4309] Federally Enforceable Through Title V Permit

37. All dryer 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

38. Source testing to measure steady state NOx emissions at the exhaust of each RTO system shall be conducted at least once every 24 months. All RTOs shall be operated and tested simultaneously while treating exhaust stream from the pet food manufacturing lines. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit

39. NOx 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 2201 and 4309] Federally Enforceable Through Title V Permit

40. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

41. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

42. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201] Federally Enforceable Through Title V Permit

43. For VOC source testing, one RTO system inlet and outlet may be sampled to determine compliance with various emission limits (i.e., VOC control efficiency, VOC emission limit) in this permit. The testing results may be substituted for the other RTO systems instead of sampling each RTO system. Failure to comply with any emission limit in this permit shall constitute violation of permits N-8234-4, '-5 and '-6. [District Rule 2201] Federally Enforceable Through Title V Permit

44. Source testing shall be conducted during an operating configuration representative of normal operations by selecting pet food recipe(s) that can be made continuously throughout the testing without any process interruptions or delays. Each pet food manufacturing line must be operated at or above 90% of the maximum hourly process rate of the chosen recipe. The pet food recipe chosen shall include at least 3% (by weight) of fresh meat. If multiple pet food lines are operated during the test, the operator must utilize the average production rate (tons of finished product produced) to demonstrate compliance with VOC emission limits (pounds per ton of finished product produced). [District Rule 2201 and 4102] Federally Enforceable Through Title V Permit

45. Source testing to determine compliance with process VOC emission limit (0.005 lb/ton of finished product produced) and VOC control efficiency (95% by weight) of the RTO shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rule 2201] Federally Enforceable Through Title V Permit

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46. The process VOC emissions shall be calculated as follows: VOC (lb/hr) = VOCinlet of the RTO (lb/hr) - VOCoutlet of the RTO (lb/hr). VOCoutlet of the RTO (lb/hr) = VOCmeasured at the outlet of RTO (lb/hr) - VOCnatural gas combustion in the RTO (lb/hr). The resulting emissions shall be translated into lb/ton basis using the actual average hourly pet food production rate(s). Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit

47. A presurvey must be done prior to source testing to determine VOC compound analytes present in the effluent streams from wet cyclone, dryer cyclone, and vertical cooler cyclone using the methodology described in EPA Method 18, Section 16. The presurvey shall be used to develop the appropriate sampling approach to ensure efficient collection of all VOCs present in the effluent and to develop a specific list of target compounds to be quantified during the subsequent total VOC source testing. VOC source testing shall be conducted using EPA Methods 18, 25, 25A, or 308. EPA Methods 25 or 25A can be used to determine the total VOCs only if the analyzer is calibrated with appropriate compound as determined during the presurvey, and the total carbon mass is scaled to the mole fraction of an appropriate compound, with the balance being scaled to the relative mole fraction of other the identified compounds. The Method 25 or 25A scaling factor shall be reported in the source test report and may be listed in the Permit to Operate for future testing (if any) required by the District. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. Upon approval from District's Compliance Division, data collected during previous presurveys of various effluent streams may be used to identify VOC compound analytes present in various effluent streams. [District Rule 2201] Federally Enforceable Through Title V Permit

48. The District may, at its discretion, require NOx, CO, VOC and PM10 source testing and odor panel testing at any time should conditions at the facility surrounding areas warrants such testing. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit

49. During each source test, the owner or operator shall keep track of all parameters that are used in demonstrating compliance with the limits in this permit, including, but not limited to: (1) date, (2) identification of pet food lines that are operated, (3) name of each recipe being produced, (4) amount of fresh meat injection rate, excluding moisture, into the steam-conditioner, (5) actual processing rate of finished product produced, tons/hour, (6) maximum hourly processing rate, tons/hour, for each recipe being produced, (7) RTO chamber temperature data (degrees Fahrenheit), (8) actual amount of fuel combusted in the dryer(s), (9) actual amount of fuel combusted in the RTO, and (10) CERMS data. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

50. 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

51. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Rate Monitoring System (CERMS) which continuously measures and records the exhaust gas NOx concentrations and exhaust flow rate, at the exhaust stack of each RTO system. CERMS shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CERMS passes the relative accuracy requirement specified herein during startups and shutdowns periods. If relative accuracy of CERMS cannot be demonstrated during startup or shutdown periods, CERMS results during startup and shutdown events shall be replaced with startup emission rates obtained during the previous NOx source testing conducted on January 24, 2019. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

52. The CERMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

53. The CERMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 for CEMS and Part 60, Appendix B Performance Specification 6 (PS6), or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

54. In accordance with 40 CFR Part 60, Appendix F, NOx monitor must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

55. The owner/operator shall perform a RATA for NOx (as specified in 40 CFR Part 60, Appendix F) and flow rate sensor at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the CERMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F for CEMS equipment. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

56. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

57. The CERMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

58. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CERMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080] Federally Enforceable Through Title V Permit

59. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CERMS data polling software system and shall make CERMS data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit

60. Upon notice by the District that the facility's CERMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CERMS data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit

61. The permittee shall maintain the following records for CERMS equipment: (1) Date, time and duration of any malfunction; (2) Date of performance testing; (3) Date of evaluations, calibrations, checks, and adjustments; and (4) Date and time period for which CERMS was inoperative. [District Rule 1080] Federally Enforceable Through Title V Permit

62. The owner or operator shall maintain records of NOx emissions and submit a written report each calendar quarter to the District containing the following information for each operating day: (1) Calendar date; (2) The average hourly NOx emission rate (expressed as NO2, lb/hr) measured at the exhaust of each RTO; (3) The total average hourly NOx emission rate (expressed as NO2, lb/hr) for all three RTOs using average hourly NOx emission rate at the exhaust of each RTO (item 2); (4) The total daily NOx emission rates (lb/day) calculated at the end of each operating day from the measured total average hourly NOx emission rates; (5) The total monthly NOx emission rate (lb/month) calculated at the end of each month using total daily NOx emissions rate; (6) The total annual NOx emission rate (lb/year, on a rolling 12-month basis) calculated at the end of each month using total monthly NOx emission rate; (7) Identification of the operating days when the calculated total hourly average NOx emission rates are in excess of the permitted NOx emissions, with the reasons for such excess emissions as well as a description of corrective actions taken; (8) Identification of the operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (9) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding such data; (10) Identification of each parameter used in calculations; (11) Identification of the times when the pollutant concentration exceeded full span of the CERMS; (12) Description of any modifications to the CERMS that could affect the ability of the CERMS to comply with Performance Specification 6; (13) Results of daily CERMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60; and (14) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

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63. The owner or operator may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 2201] Federally Enforceable Through Title V Permit

64. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

65. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] Federally Enforceable Through Title V Permit

66. The owner or operator shall maintain daily records of the following items: (1) date, (2) name of the pet food recipe being produced, (3) RTO temperature monitoring data, (4) fresh meat injection rate, excluding moisture, into the steam conditioner (tons/day), (5) the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day), (6) amount of finished product produced by this line (tons/day); the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day) may be used to demonstrate compliance with the amount of finished product produced by this line (tons/day), (7) heat input rate to each RTO, in MMBtu/day and in MMBtu/year on a rolling 12 consecutive month period, (8) combined total heat input rate to all three RTOs in MMBtu/year on a rolling 12 consecutive month period, (9) combined process and combustion NOx emissions at the exhaust of each RTO (including the contribution of dryer NOx emissions) in lb/day and lb/year on a rolling 12 consecutive month period, and (10) combined process and combustion NOx emissions at the exhaust of all three RTOs (including the contribution of NOx emissions from dryers) in lb/year on a rolling 12 consecutive month period. [District Rule 2201] Federally Enforceable Through Title V Permit

67. Each RTO system (i.e., RTO, duct work, sensors, and other equipment) shall be installed, operated, and maintained per the manufacturer's (vendor) recommendations. A copy of manufacturer's recommendations shall be kept on site at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

68. The owner or operator shall maintain all records of maintenance for each RTO system including date, RTO identification, reason for the maintenance, description of the maintenance activity, name of the individual performing the inspection and company affiliation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

69. All records shall be maintained and retained on-site for minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4309] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-5-14 **EXPIRATION DATE:** 04/30/2025

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EQUIPMENT DESCRIPTION:
PET FOOD PROCESSING LINE #2

PERMIT UNIT REQUIREMENTS

1. Particulate matter, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All exhaust stacks under this permit 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. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Material Dispensing, Kibble Manufacturing, and Conveying Systems: The material from the extruder surge bin is dispensed into an extruder bin from where the material is transferred into an EXTRU-TECH 24X144 steam-conditioner system. The material is extruded to form kibbles. The kibbles are pneumatically conveyed using HEPA filtered air into a dryer receiving chamber using HORIZON SYSTEMS HT-68 high volume cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the wet cyclone (Horizon HT-68) into the duct connected to the RTO. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
5. Dryer System: The system consists of an EXTRU-TECH 1053-2P-AF11, 10 MMBtu/hr (total) direct-fired natural gas fired dryer with five drying sections, each section is equipped with an ECLIPSE WINNOX WX0200 burner with a maximum heat input rate of 2.0 MMBtu/hr. The dryer exhaust is vented to a MAC HE60 high efficiency cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the dryer cyclone (MAC HE60) into the duct connected to the RTO. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
6. Cooler and Conveying System: The system consists of three cooler sections, all vented to a MAC high efficiency cyclone, a discharge conveyor for the transfer of dried kibbles into a hopper. The material from the hopper is pneumatically conveyed to an enclosed shaker screener. The owner or operator shall install and maintain a duct work to re-circulate the exhaust from the dryer cooler cyclone (MAC) into the Dryer System. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
7. Fines Collection and Conveying System: This system collects fines from two locations in the dryer, the dryer cyclone discharge, and the cooler cyclone discharge, and vents these fines to a HORIZON SYSTEMS 28S WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Screening and Conveying System. The system consists of an enclosed shaker screener, an enclosed surge bin, and an enclosed weigh belt. The fines (rejects) are dropped to the dumpsters. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Coating and Conveying System: The system consists of a hopper where material from a weight belt is sprayed with chicken fat and canola oil (or other similar ingredients) and a coating reel where dry dog/cat digest and probiotics (or other similar ingredients) are sprinkled to be absorbed into the kibbles. The kibbles are then conveyed pneumatically to a vertical cooler system using a filter receiver system with a static sock filter. [District Rule 2201] Federally Enforceable Through Title V Permit

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10. Vertical Cooler and Conveying System: A vertical cooler vented to a MAC HE52 high efficiency cyclone. The dried material falls on a vibratory pan on sliding rails. The material (accepts) from the vibratory pan drops into a hopper from where the dried kibbles are pneumatically conveyed to the finished product bins. Each bin shall be vented to a static sock filter. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to a barrel. The owner or operator shall install and maintain a duct work to discharge exhaust from the vertical cooler cyclone (MAC HE 52) into the duct connected to the RTO. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
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18. The post control VOC emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.005 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
19. No more than 36 tons of fresh meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The combined amount of finished product produced through all pet food manufacturing lines (N-8234-4, '-5 and '-6) shall not exceed 780 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Emissions from the dryer shall not exceed any of the following limits: 2.1 ppmvd NOx @ 19% O2 (0.024 lb-NOx/MMBtu), 16.5 ppmvd CO @ 19% O2 (0.112 lb-CO/MMBtu) and 0.00285 lb-SOx/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

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23. The RTO(s) shall reduce the VOC emissions (not including VOC emissions from natural gas combustion in the RTO) from pet food manufacturing operations by at least 95% (by weight). [District Rule 2201] Federally Enforceable Through Title V Permit

24. The total NOx emissions from the three RTO unit system and three dryers combined shall not exceed any of the following limits: 8.343 lb/hr and 200.4 lb/day and 33,639 lb/yr (12-month rolling basis). Compliance with these mass emission rates shall be demonstrated using NOx (ppmvd) and exhaust gas flow rate (Q, dry standard cubic feet per minute, dscfm) data recorded by the CERMS, according to the following equation: Emissions (lb/hr) = (NOx ppmvd x 46 lb/lb-mol x 60 min/hr x Q (dscfm)) ÷ (379.5 dscf/lb-mol x 1000,000). Daily emissions for each RTO shall be calculated by summing the hourly emissions for the respective calendar day. Hourly or daily emissions data shall be used to calculate monthly emissions. Monthly data shall be used to calculate rolling 12-month totals. [District Rule 2201] Federally Enforceable Through Title V Permit

25. Emissions due to natural gas combustion in each RTO shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.88 lb-CO/MMBtu and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Heat input rate to each RTO shall not exceed any of the following limits: 184.8 MMBtu/day and 67,082 MMBtu/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit

27. Combined total heat input rate to all three RTOs shall not exceed 156,816 MMBtu/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit

28. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 of the dryer (at the exhaust stack of the MAC HE60 cyclone, upstream of the duct collecting discharge from other process streams), 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

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 Rules 2201 and 4309] Federally Enforceable Through Title V Permit

30. If either the dryer 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

31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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

32. 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

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33. 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

34. 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 Rules 2201 and 4309] Federally Enforceable Through Title V Permit

35. 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 1081, 2201 and 4309] Federally Enforceable Through Title V Permit

36. Source testing to determine NOx and CO emissions from the dryer at the exhaust stack of the MAC HE60 cyclone by obtaining samples upstream of the duct collecting discharge from other process streams shall be conducted at least once every 24 months. [District Rule 4309] Federally Enforceable Through Title V Permit

37. All dryer 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

38. Source testing to measure steady state NOx emissions at the exhaust of each RTO system shall be conducted at least once every 24 months. All RTOs shall be operated and tested simultaneously while treating exhaust stream from the pet food manufacturing lines. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit

39. NOx 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 2201 and 4309] Federally Enforceable Through Title V Permit

40. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

41. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

42. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201] Federally Enforceable Through Title V Permit

43. For VOC source testing, one RTO system inlet and outlet may be sampled to determine compliance with various emission limits (i.e., VOC control efficiency, VOC emission limit) in this permit. The testing results may be substituted for the other RTO systems instead of sampling each RTO system. Failure to comply with any emission limit in this permit shall constitute violation of permits N-8234-4, '-5 and '-6. [District Rule 2201] Federally Enforceable Through Title V Permit

44. Source testing shall be conducted during an operating configuration representative of normal operations by selecting pet food recipe(s) that can be made continuously throughout the testing without any process interruptions or delays. Each pet food manufacturing line must be operated at or above 90% of the maximum hourly process rate of the chosen recipe. The pet food recipe chosen shall include at least 3% (by weight) of fresh meat. If multiple pet food lines are operated during the test, the operator must utilize the average production rate (tons of finished product produced) to demonstrate compliance with VOC emission limits (pounds per ton of finished product produced). [District Rule 2201 and 4102] Federally Enforceable Through Title V Permit

45. Source testing to determine compliance with process VOC emission limit (0.005 lb/ton of finished product produced) and VOC control efficiency (95% by weight) of the RTO shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rule 2201] Federally Enforceable Through Title V Permit

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46. The process VOC emissions shall be calculated as follows: VOC (lb/hr) = VOCinlet of the RTO (lb/hr) - VOCoutlet of the RTO (lb/hr). VOCoutlet of the RTO (lb/hr) = VOCmeasured at the outlet of RTO (lb/hr) - VOCnatural gas combustion in the RTO (lb/hr). The resulting emissions shall be translated into lb/ton basis using the actual average hourly pet food production rate(s). Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit

47. A presurvey must be done prior to source testing to determine VOC compound analytes present in the effluent streams from wet cyclone, dryer cyclone, and vertical cooler cyclone using the methodology described in EPA Method 18, Section 16. The presurvey shall be used to develop the appropriate sampling approach to ensure efficient collection of all VOCs present in the effluent and to develop a specific list of target compounds to be quantified during the subsequent total VOC source testing. VOC source testing shall be conducted using EPA Methods 18, 25, 25A, or 308. EPA Methods 25 or 25A can be used to determine the total VOCs only if the analyzer is calibrated with appropriate compound as determined during the presurvey, and the total carbon mass is scaled to the mole fraction of an appropriate compound, with the balance being scaled to the relative mole fraction of other the identified compounds. The Method 25 or 25A scaling factor shall be reported in the source test report and may be listed in the Permit to Operate for future testing (if any) required by the District. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. Upon approval from District's Compliance Division, data collected during previous presurveys of various effluent streams may be used to identify VOC compound analytes present in various effluent streams. [District Rule 2201] Federally Enforceable Through Title V Permit

48. The District may, at its discretion, require NOx, CO, VOC and PM10 source testing and odor panel testing at any time should conditions at the facility surrounding areas warrants such testing. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit

49. During each source test, the owner or operator shall keep track of all parameters that are used in demonstrating compliance with the limits in this permit, including, but not limited to: (1) date, (2) identification of pet food lines that are operated, (3) name of each recipe being produced, (4) amount of fresh meat injection rate, excluding moisture, into the steam-conditioner, (5) actual processing rate of finished product produced, tons/hour, (6) maximum hourly processing rate, tons/hour, for each recipe being produced, (7) RTO chamber temperature data (degrees Fahrenheit), (8) actual amount of fuel combusted in the dryer(s), (9) actual amount of fuel combusted in the RTO, and (10) CERMS data. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

50. 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

51. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Rate Monitoring System (CERMS) which continuously measures and records the exhaust gas NOx concentrations and exhaust flow rate, at the exhaust stack of each RTO system. CERMS shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CERMS passes the relative accuracy requirement specified herein during startups and shutdowns periods. If relative accuracy of CERMS cannot be demonstrated during startup or shutdown periods, CERMS results during startup and shutdown events shall be replaced with startup emission rates obtained during the previous NOx source testing conducted on January 24, 2019. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

52. The CERMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

53. The CERMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 for CEMS and Part 60, Appendix B Performance Specification 6 (PS6), or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

54. In accordance with 40 CFR Part 60, Appendix F, NOx monitor must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

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55. The owner/operator shall perform a RATA for NOx (as specified in 40 CFR Part 60, Appendix F) and flow rate sensor at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the CERMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F for CEMS equipment. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

56. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

57. The CERMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

58. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CERMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080] Federally Enforceable Through Title V Permit

59. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CERMS data polling software system and shall make CERMS data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit

60. Upon notice by the District that the facility's CERMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CERMS data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit

61. The permittee shall maintain the following records for CERMS equipment: (1) Date, time and duration of any malfunction; (2) Date of performance testing; (3) Date of evaluations, calibrations, checks, and adjustments; and (4) Date and time period for which CERMS was inoperative. [District Rule 1080] Federally Enforceable Through Title V Permit

62. The owner or operator shall maintain records of NOx emissions and submit a written report each calendar quarter to the District containing the following information for each operating day: (1) Calendar date; (2) The average hourly NOx emission rate (expressed as NO2, lb/hr) measured at the exhaust of each RTO; (3) The total average hourly NOx emission rate (expressed as NO2, lb/hr) for all three RTOs using average hourly NOx emission rate at the exhaust of each RTO (item 2); (4) The total daily NOx emission rates (lb/day) calculated at the end of each operating day from the measured total average hourly NOx emission rates; (5) The total monthly NOx emission rate (lb/month) calculated at the end of each month using total daily NOx emissions rate; (6) The total annual NOx emission rate (lb/year, on a rolling 12-month basis) calculated at the end of each month using total monthly NOx emission rate; (7) Identification of the operating days when the calculated total hourly average NOx emission rates are in excess of the permitted NOx emissions, with the reasons for such excess emissions as well as a description of corrective actions taken; (8) Identification of the operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (9) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding such data; (10) Identification of each parameter used in calculations; (11) Identification of the times when the pollutant concentration exceeded full span of the CERMS; (12) Description of any modifications to the CERMS that could affect the ability of the CERMS to comply with Performance Specification 6; (13) Results of daily CERMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60; and (14) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

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63. The owner or operator may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 2201] Federally Enforceable Through Title V Permit

64. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

65. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] Federally Enforceable Through Title V Permit

66. The owner or operator shall maintain daily records of the following items: (1) date, (2) name of the pet food recipe being produced, (3) RTO temperature monitoring data, (4) fresh meat injection rate, excluding moisture, into the steam conditioner (tons/day), (5) the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day), (6) amount of finished product produced by this line (tons/day); the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day) may be used to demonstrate compliance with the amount of finished product produced by this line (tons/day), (7) heat input rate to each RTO, in MMBtu/day and in MMBtu/year on a rolling 12 consecutive month period, (8) combined total heat input rate to all three RTOs in MMBtu/year on a rolling 12 consecutive month period, (9) combined process and combustion NOx emissions at the exhaust of each RTO (including the contribution of dryer NOx emissions) in lb/day and lb/year on a rolling 12 consecutive month period, and (10) combined process and combustion NOx emissions at the exhaust of all three RTOs (including the contribution of NOx emissions from dryers) in lb/year on a rolling 12 consecutive month period. [District Rule 2201] Federally Enforceable Through Title V Permit

67. Each RTO system (i.e., RTO, duct work, sensors, and other equipment) shall be installed, operated, and maintained per the manufacturer's (vendor) recommendations. A copy of manufacturer's recommendations shall be kept on site at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

68. The owner or operator shall maintain all records of maintenance for each RTO system including date, RTO identification, reason for the maintenance, description of the maintenance activity, name of the individual performing the inspection and company affiliation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

69. All records shall be maintained and retained on-site for minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4309] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-6-14 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
PET FOOD PROCESSING LINE #3

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PERMIT UNIT REQUIREMENTS

1. Particulate matter, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All exhaust stacks under this permit 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. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Material Dispensing, Kibble Manufacturing, and Conveying Systems: The material from the extruder surge bin is dispensed into an extruder bin from where the material is transferred into an EXTRU-TECH 24X144 steam-conditioner system. The material is extruded to form kibbles. The kibbles are pneumatically conveyed using HEPA filtered air into a dryer receiving chamber using HORIZON SYSTEMS HT-68 high volume cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the wet cyclone (Horizon HT-68) into the duct connected to the RTO. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
5. Dryer System: The system consists of an EXTRU-TECH 1053-2P-AF11, 10 MMBtu/hr (total) direct-fired natural gas fired dryer with five drying sections, each section is equipped with an ECLIPSE WINNOX WX0200 burner with a maximum heat input rate of 2.0 MMBtu/hr. The dryer exhaust is vented to a MAC HE60 high efficiency cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the dryer cyclone (MAC HE60) into the duct connected to the RTO. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
6. Cooler and Conveying System: The system consists of three cooler sections, all vented to a MAC high efficiency cyclone, a discharge conveyor for the transfer of dried kibbles into a hopper. The material from the hopper is pneumatically conveyed to an enclosed shaker screener. The owner or operator shall install and maintain a duct work to re-circulate the exhaust from the dryer cooler cyclone (MAC) into the Dryer System. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
7. Fines Collection and Conveying System: This system collects fines from two locations in the dryer, the dryer cyclone discharge, and the cooler cyclone discharge, and vents these fines to a HORIZON SYSTEMS 28S WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Screening and Conveying System. The system consists of an enclosed shaker screener, an enclosed surge bin, and an enclosed weigh belt. The fines (rejects) are dropped to the dumpsters. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Coating and Conveying System: The system consists of a hopper where material from a weight belt is sprayed with chicken fat and canola oil (or other similar ingredients) and a coating reel where dry dog/cat digest and probiotics (or other similar ingredients) are sprinkled to be absorbed into the kibbles. The kibbles are then conveyed pneumatically to a vertical cooler system using a filter receiver system with a static sock filter. [District Rule 2201] Federally Enforceable Through Title V Permit

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10. Vertical Cooler and Conveying System: A vertical cooler vented to a MAC HE52 high efficiency cyclone. The dried material falls on a vibratory pan on sliding rails. The material (accepts) from the vibratory pan drops into a hopper from where the dried kibbles are pneumatically conveyed to the finished product bins. Each bin shall be vented to a static sock filter. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to a barrel. The owner or operator shall install and maintain a duct work to discharge exhaust from the vertical cooler cyclone (MAC HE 52) into the duct connected to the RTO. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
11. The owner or operator shall install, operate and maintain three identical Durr Systems, Inc.'s Ecopure RL-60 regenerative thermal oxidizers (RTO) each equipped with 7.7 MMBtu/hr burner, associated duct work and control equipment, to abate pet food odors and reduce VOC emissions from all pet food manufacturing lines discharge stacks (wet cyclone (Horizon HT-68), dryer cyclone (MAC HE60) and vertical cooler cyclone (MAC HE52)). [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
12. Each RTO shall be equipped with non-resettable fuel flow meter(s) to measure natural gas fuel flow into each RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Each RTO's combustion chamber temperature shall be maintained at or above 1650 degrees Fahrenheit whenever odor abatement is occuring in the specific RTO. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. Each RTO's chamber shall be permanently equipped with temperature measurement devices to determine the average combustion chamber temperature. The combustion temperature shall be continuously monitored and recorded at least every 15-minutes whenever odor abatement is occuring in the specific RTO. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established RTO combustion chamber temperature. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
15. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) 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
16. The dryer and RTO(s) shall only be fired on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM10 emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.0306 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The post control VOC emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.005 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
19. No more than 36 tons of fresh meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The combined amount of finished product produced through all pet food manufacturing lines (N-8234-4, '-5 and '-6) shall not exceed 780 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Emissions from the dryer shall not exceed any of the following limits: 2.1 ppmvd NOx @ 19% O2 (0.024 lb-NOx/MMBtu), 16.5 ppmvd CO @ 19% O2 (0.112 lb-CO/MMBtu) and 0.00285 lb-SOx/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

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23. The RTO(s) shall reduce the VOC emissions (not including VOC emissions from natural gas combustion in the RTO) from pet food manufacturing operations by at least 95% (by weight). [District Rule 2201] Federally Enforceable Through Title V Permit

24. The total NOx emissions from the three RTO unit system and three dryers combined shall not exceed any of the following limits: 8.343 lb/hr and 200.4 lb/day and 33,639 lb/yr (12-month rolling basis). Compliance with these mass emission rates shall be demonstrated using NOx (ppmvd) and exhaust gas flow rate (Q, dry standard cubic feet per minute, dscfm) data recorded by the CERMS, according to the following equation: Emissions (lb/hr) = (NOx ppmvd x 46 lb/lb-mol x 60 min/hr x Q (dscfm)) ÷ (379.5 dscf/lb-mol x 1000,000). Daily emissions for each RTO shall be calculated by summing the hourly emissions for the respective calendar day. Hourly or daily emissions data shall be used to calculate monthly emissions. Monthly data shall be used to calculate rolling 12-month totals. [District Rule 2201] Federally Enforceable Through Title V Permit

25. Emissions due to natural gas combustion in each RTO shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.88 lb-CO/MMBtu and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Heat input rate to each RTO shall not exceed any of the following limits: 184.8 MMBtu/day and 67,082 MMBtu/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit

27. Combined total heat input rate to all three RTOs shall not exceed 156,816 MMBtu/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit

28. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 of the dryer (at the exhaust stack of the MAC HE60 cyclone, upstream of the duct collecting discharge from other process streams), 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

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 Rules 2201 and 4309] Federally Enforceable Through Title V Permit

30. If either the dryer 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

31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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

32. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

33. 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

34. 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 Rules 1081, 2201 and 4309] Federally Enforceable Through Title V Permit

35. 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 2201 and 4309] Federally Enforceable Through Title V Permit

36. Source testing to determine NOx and CO emissions from the dryer at the exhaust stack of the MAC HE60 cyclone by obtaining samples upstream of the duct collecting discharge from other process streams shall be conducted at least once every 24 months. [District Rule 4309] Federally Enforceable Through Title V Permit

37. All dryer 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

38. Source testing to measure steady state NOx emissions at the exhaust of each RTO system shall be conducted at least once every 24 months. All RTOs shall be operated and tested simultaneously while treating exhaust stream from the pet food manufacturing lines. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit

39. NOx 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 2201 and 4309] Federally Enforceable Through Title V Permit

40. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

41. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

42. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201] Federally Enforceable Through Title V Permit

43. For VOC source testing, one RTO system inlet and outlet may be sampled to determine compliance with various emission limits (i.e., VOC control efficiency, VOC emission limit) in this permit. The testing results may be substituted for the other RTO systems instead of sampling each RTO system. Failure to comply with any emission limit in this permit shall constitute violation of permits N-8234-4, '-5 and '-6. [District Rule 2201] Federally Enforceable Through Title V Permit

44. Source testing shall be conducted during an operating configuration representative of normal operations by selecting pet food recipe(s) that can be made continuously throughout the testing without any process interruptions or delays. Each pet food manufacturing line must be operated at or above 90% of the maximum hourly process rate of the chosen recipe. The pet food recipe chosen shall include at least 3% (by weight) of fresh meat. If multiple pet food lines are operated during the test, the operator must utilize the average production rate (tons of finished product produced) to demonstrate compliance with VOC emission limits (pounds per ton of finished product produced). [District Rule 2201 and 4102] Federally Enforceable Through Title V Permit

45. Source testing to determine compliance with process VOC emission limit (0.005 lb/ton of finished product produced) and VOC control efficiency (95% by weight) of the RTO shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rule 2201] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

46. The process VOC emissions shall be calculated as follows: VOC (lb/hr) = VOCinlet of the RTO (lb/hr) - VOCoutlet of the RTO (lb/hr). VOCoutlet of the RTO (lb/hr) = VOCmeasured at the outlet of RTO (lb/hr) - VOCnatural gas combustion in the RTO (lb/hr). The resulting emissions shall be translated into lb/ton basis using the actual average hourly pet food production rate(s). Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit

47. A presurvey must be done prior to source testing to determine VOC compound analytes present in the effluent streams from wet cyclone, dryer cyclone, and vertical cooler cyclone using the methodology described in EPA Method 18, Section 16. The presurvey shall be used to develop the appropriate sampling approach to ensure efficient collection of all VOCs present in the effluent and to develop a specific list of target compounds to be quantified during the subsequent total VOC source testing. VOC source testing shall be conducted using EPA Methods 18, 25, 25A, or 308. EPA Methods 25 or 25A can be used to determine the total VOCs only if the analyzer is calibrated with appropriate compound as determined during the presurvey, and the total carbon mass is scaled to the mole fraction of an appropriate compound, with the balance being scaled to the relative mole fraction of other the identified compounds. The Method 25 or 25A scaling factor shall be reported in the source test report and may be listed in the Permit to Operate for future testing (if any) required by the District. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. Upon approval from District's Compliance Division, data collected during previous presurveys of various effluent streams may be used to identify VOC compound analytes present in various effluent streams. [District Rule 2201] Federally Enforceable Through Title V Permit

48. The District may, at its discretion, require NOx, CO, VOC and PM10 source testing and odor panel testing at any time should conditions at the facility surrounding areas warrants such testing. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit

49. During each source test, the owner or operator shall keep track of all parameters that are used in demonstrating compliance with the limits in this permit, including, but not limited to: (1) date, (2) identification of pet food lines that are operated, (3) name of each recipe being produced, (4) amount of fresh meat injection rate, excluding moisture, into the steam-conditioner, (5) actual processing rate of finished product produced, tons/hour, (6) maximum hourly processing rate, tons/hour, for each recipe being produced, (7) RTO chamber temperature data (degrees Fahrenheit), (8) actual amount of fuel combusted in the dryer(s), (9) actual amount of fuel combusted in the RTO, and (10) CERMS data. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

50. 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

51. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Rate Monitoring System (CERMS) which continuously measures and records the exhaust gas NOx concentrations and exhaust flow rate, at the exhaust stack of each RTO system. CERMS shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CERMS passes the relative accuracy requirement specified herein during startups and shutdowns periods. If relative accuracy of CERMS cannot be demonstrated during startup or shutdown periods, CERMS results during startup and shutdown events shall be replaced with startup emission rates obtained during the previous NOx source testing conducted on January 24, 2019. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

52. The CERMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

53. The CERMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 for CEMS and Part 60, Appendix B Performance Specification 6 (PS6), or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

54. In accordance with 40 CFR Part 60, Appendix F, NOx monitor must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

55. The owner/operator shall perform a RATA for NOx (as specified in 40 CFR Part 60, Appendix F) and flow rate sensor at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the CERMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F for CEMS equipment. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

56. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

57. The CERMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

58. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CERMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080] Federally Enforceable Through Title V Permit

59. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CERMS data polling software system and shall make CERMS data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit

60. Upon notice by the District that the facility's CERMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CERMS data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit

61. The permittee shall maintain the following records for CERMS equipment: (1) Date, time and duration of any malfunction; (2) Date of performance testing; (3) Date of evaluations, calibrations, checks, and adjustments; and (4) Date and time period for which CERMS was inoperative. [District Rule 1080] Federally Enforceable Through Title V Permit

62. The owner or operator shall maintain records of NOx emissions and submit a written report each calendar quarter to the District containing the following information for each operating day: (1) Calendar date; (2) The average hourly NOx emission rate (expressed as NO2, lb/hr) measured at the exhaust of each RTO; (3) The total average hourly NOx emission rate (expressed as NO2, lb/hr) for all three RTOs using average hourly NOx emission rate at the exhaust of each RTO (item 2); (4) The total daily NOx emission rates (lb/day) calculated at the end of each operating day from the measured total average hourly NOx emission rates; (5) The total monthly NOx emission rate (lb/month) calculated at the end of each month using total daily NOx emissions rate; (6) The total annual NOx emission rate (lb/year, on a rolling 12-month basis) calculated at the end of each month using total monthly NOx emission rate; (7) Identification of the operating days when the calculated total hourly average NOx emission rates are in excess of the permitted NOx emissions, with the reasons for such excess emissions as well as a description of corrective actions taken; (8) Identification of the operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (9) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding such data; (10) Identification of each parameter used in calculations; (11) Identification of the times when the pollutant concentration exceeded full span of the CERMS; (12) Description of any modifications to the CERMS that could affect the ability of the CERMS to comply with Performance Specification 6; (13) Results of daily CERMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60; and (14) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

63. The owner or operator may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 2201] Federally Enforceable Through Title V Permit

64. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

65. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] Federally Enforceable Through Title V Permit

66. The owner or operator shall maintain daily records of the following items: (1) date, (2) name of the pet food recipe being produced, (3) RTO temperature monitoring data, (4) fresh meat injection rate, excluding moisture, into the steam conditioner (tons/day), (5) the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day), (6) amount of finished product produced by this line (tons/day); the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day) may be used to demonstrate compliance with the amount of finished product produced by this line (tons/day), (7) heat input rate to each RTO, in MMBtu/day and in MMBtu/year on a rolling 12 consecutive month period, (8) combined total heat input rate to all three RTOs in MMBtu/year on a rolling 12 consecutive month period, (9) combined process and combustion NOx emissions at the exhaust of each RTO (including the contribution of dryer NOx emissions) in lb/day and lb/year on a rolling 12 consecutive month period, and (10) combined process and combustion NOx emissions at the exhaust of all three RTOs (including the contribution of NOx emissions from dryers) in lb/year on a rolling 12 consecutive month period. [District Rule 2201] Federally Enforceable Through Title V Permit

67. Each RTO system (i.e., RTO, duct work, sensors, and other equipment) shall be installed, operated, and maintained per the manufacturer's (vendor) recommendations. A copy of manufacturer's recommendations shall be kept on site at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

68. The owner or operator shall maintain all records of maintenance for each RTO system including date, RTO identification, reason for the maintenance, description of the maintenance activity, name of the individual performing the inspection and company affiliation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

69. All records shall be maintained and retained on-site for minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4309] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-7-3

EXPIRATION DATE: 04/30/2025

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EQUIPMENT DESCRIPTION:
THIELE PACKAGING LINE 1

PERMIT UNIT REQUIREMENTS

1. Material Dispensing, Screening, and Conveying System, Thiele Line 1: This system includes enclosed material dispensing from any nineteen finished product storage bins into an enclosed belt conveyor that transfers the material into an enclosed shaker screen. The material (accepts) from the screen is pneumatically conveyed into the packaging line #1 hopper feeding the metering bin(s). The material from the metering bin(s) is dispensed into the packaging bags. The pneumatic conveying system consists of a filter receiver with a static sock. The fines (rejects) from the shaker screen are discharged into a tote in the basement. The tote shall have tight-fitting top lid with a static sock filter. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions, at the exhaust of pneumatic conveying system vent, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions, at the exhaust of each sock filter 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
4. PM10 emissions from the operations covered under this permit shall not exceed 0.0011 pounds per ton of material packaged. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No more than 1,200 tons of total material shall be packaged on this line in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The combined total amount of finished product packaged for all pet food packaging lines (N-8234-7, '-8, '-9, '-14) shall not exceed 1,200 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The owner or operator shall keep daily records of the date and combined total amount of product packaged (in tons) on packaging lines under permits N-8234-7, '-8, '-9 and '-14. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-8-3

EXPIRATION DATE: 04/30/2025

EQUIPMENT DESCRIPTION:
THIELE PACKAGING LINE 2

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PERMIT UNIT REQUIREMENTS

1. Material Dispensing, Screening, and Conveying System, Thiele Line 2: This system includes enclosed material dispensing from any nineteen finished product storage bins into an enclosed belt conveyor that transfers the material into an enclosed shaker screen. The material (accepts) from the screen is pneumatically conveyed into the packaging line #2 hopper feeding the metering bin(s). The material from the metering bin(s) is dispensed into the packaging bags. The pneumatic conveying system consists of a filter receiver with a static sock. The fines (rejects) from the shaker screen are discharged into a tote in the basement. The tote shall have tight-fitting top lid with a static sock filter. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions, at the exhaust of pneumatic conveying system vent, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions, at the exhaust of each sock filter 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
4. PM10 emissions from the operations covered under this permit shall not exceed 0.0011 pounds per ton of material packaged. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No more than 1,200 tons of total material shall be packaged on this line in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The combined total amount of finished product packaged for all pet food packaging lines (N-8234-7, '-8, '-9, '-14) shall not exceed 1,200 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The owner or operator shall keep daily records of the date and combined total amount of product packaged (in tons) on packaging lines under permits N-8234-7, '-8, '-9 and '-14. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-9-4

EXPIRATION DATE: 04/30/2025

EQUIPMENT DESCRIPTION:
UVA PACKAGING LINE 3

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PERMIT UNIT REQUIREMENTS

1. Material Dispensing, Screening, and Conveying System, UVA Line 3: This system includes enclosed material dispensing from any nineteen finished product storage bins into an enclosed belt conveyor that transfers the material into a diverter of another enclosed conveyor, which transfers the material into an enclosed shaker screen. The material (accepts) from the screen is pneumatically conveyed into the packaging line #3 hopper. The material from the hopper is dispensed into an enclosed conveyor that delivers the product into another enclosed conveyor feeding the metering bin(s). The material from the metering bin(s) is dispensed into the packaging bags. The pneumatic conveying system consists of a filter receiver with a static sock. The fines (rejects) from the shaker screen are discharged into a tote in the basement. The tote shall have tight-fitting top lid with a static sock filter. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions, at the exhaust of pneumatic conveying system vent, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions, at the exhaust of each sock filter 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
4. PM10 emissions from the operations covered under this permit shall not exceed 0.0015 pounds per ton of material packaged. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No more than 1,200 tons of total material shall be packaged on this line in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The combined total amount of finished product packaged for all pet food packaging lines (N-8234-7, '-8, '-9, '-14) shall not exceed 1,200 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The owner or operator shall keep daily records of the date and combined total amount of product packaged (in tons) on packaging lines under permits N-8234-7, '-8, '-9 and '-14. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-10-3 **EXPIRATION DATE:** 04/30/2025

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EQUIPMENT DESCRIPTION:
14.65 MMBTU/HR CLEAVER BROOKS CBLE 700-350, 150# FIRE-TUBE BOILER EQUIPPED WITH CLEAVER BROOKS CB-350 LOW NOX BURNER VENTED TO C&C PANASIA MODEL PANOX CP-12 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM (BOILER #1)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. 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. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201 and 4351, and 40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
5. Duration of each start-up or each shutdown shall not exceed 2.0 hours. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
6. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
7. The combined total heat input rate to the boilers under permits N-8234-10 and N-8234-11 shall not exceed 128,334 MMBtu in any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
8. NOx emissions shall not exceed 9.0 ppmvd @ 3% O2 (0.011 lb/MMBtu) referenced as NO2. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
9. CO emissions shall not exceed 50 ppmvd @ 3% O2 (0.037 lb/MMBtu). [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
10. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions shall not exceed 0.003 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC emissions shall not exceed 0.004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. NH3 emissions from the SCR shall not exceed 10.0 ppmvd @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. Source testing to measure NOx, CO, and NH3 emissions from this unit while fired on natural gas shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests when unit is fired on natural gas, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
16. NOx 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, 4320 and 4351] 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, 4320 and 4351] 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, 4320 and 4351] Federally Enforceable Through Title V Permit
19. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
22. 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, 4320 and 4351] Federally Enforceable Through Title V Permit
23. 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 1081, 4305, 4306, and 4320] 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. The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing gas detection tubes (Draeger brand or District approved equivalent). 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 it has been performed within the last month. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
26. If either the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

27. All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

28. Ammonia emissions readings shall be conducted at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 2201, 4305, 4306 and 4351] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

30. The permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit

31. The permittee shall maintain monthly records of the type of fuel and the amount of the fuel combusted (scf/month) in this boiler. [40 CFR 60.48c(g) and 4351] Federally Enforceable Through Title V Permit

32. The permittee shall maintain monthly records of the total heat input rate (MMBtu) to the boilers under permits N-8234-10 and N-8234-11 in the previous 12 consecutive months. [District Rule 2201] Federally Enforceable Through Title V Permit

33. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4305, 4306, 4320 and 4351, and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit

34. {5026} Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

35. By May 1, 2028, the owner or operator shall submit an Emission Control Plan (pursuant to section 6.4 of District Rule 4306 (12/17/20)) and Authority to Construct permit application identifying the steps to be taken to comply with the Tier 2-NOx and CO limits in Table 2 of District Rule 4306 (12/17/20) by December 31, 2029. [District Rule 4306]

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-11-3 **EXPIRATION DATE:** 04/30/2025

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EQUIPMENT DESCRIPTION:
14.65 MMBTU/HR CLEAVER BROOKS CBLE 700-350, 150# FIRE-TUBE BOILER EQUIPPED WITH CLEAVER BROOKS CB-350 LOW NOX BURNER VENTED TO C&C PANASIA MODEL PANOX CP-12 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM (BOILER #2)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. 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. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201 and 4351, and 40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
5. Duration of each start-up or each shutdown shall not exceed 2.0 hours. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
6. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
7. The combined total heat input rate to the boilers under permits N-8234-10 and N-8234-11 shall not exceed 128,334 MMBtu in any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
8. NOx emissions shall not exceed 9.0 ppmvd @ 3% O2 (0.011 lb/MMBtu) referenced as NO2. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
9. CO emissions shall not exceed 50 ppmvd @ 3% O2 (0.037 lb/MMBtu). [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
10. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions shall not exceed 0.003 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC emissions shall not exceed 0.004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. NH3 emissions from the SCR shall not exceed 10.0 ppmvd @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. Source testing to measure NOx, CO, and NH3 emissions from this unit while fired on natural gas shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests when unit is fired on natural gas, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
16. NOx 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, 4320 and 4351] 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, 4320 and 4351] 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, 4320 and 4351] Federally Enforceable Through Title V Permit
19. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
22. 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, 4320 and 4351] Federally Enforceable Through Title V Permit
23. 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 1081, 4305, 4306, and 4320] 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. The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing gas detection tubes (Draeger brand or District approved equivalent). 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 it has been performed within the last month. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
26. If either the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

27. All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

28. Ammonia emissions readings shall be conducted at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 2201, 4305, 4306 and 4351] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

30. The permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit

31. The permittee shall maintain monthly records of the type of fuel and the amount of the fuel combusted (scf/month) in this boiler. [40 CFR 60.48c(g) and 4351] Federally Enforceable Through Title V Permit

32. The permittee shall maintain monthly records of the total heat input rate (MMBtu) to the boilers under permits N-8234-10 and N-8234-11 in the previous 12 consecutive months. [District Rule 2201] Federally Enforceable Through Title V Permit

33. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4305, 4306, 4320 and 4351, and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit

34. {5026} Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

35. By May 1, 2028, the owner or operator shall submit an Emission Control Plan (pursuant to section 6.4 of District Rule 4306 (12/17/20)) and Authority to Construct permit application identifying the steps to be taken to comply with the Tier 2-NOx and CO limits in Table 2 of District Rule 4306 (12/17/20) by December 31, 2029. [District Rule 4306]

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-12-1 **EXPIRATION DATE:** 04/30/2025

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EQUIPMENT DESCRIPTION:
270 BHP CUMMINS MODEL 6CTA8.3F2 DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. The engine shall be equipped with a turbocharger and with an aftercooler. [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. Emissions shall not exceed any of the following: 6.03 g-NOx/bhp-hr, 1.79 g-CO/bhp-hr, 0.76 g-VOC/bhp-hr, or 0.25 g-PM10b/hp-hr. [District NSR Rule]
6. This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702, 17 CCR 93115, and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 30 hours per calendar year. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. The engine shall be operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

12. The owner or operator has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

13. 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 Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

14. 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 Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

15. The owner or operator shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

16. The owner or operator 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 Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

17. The owner or operator shall keep records of the maintenance conducted on the engine to demonstrate that the engine and the associated emissions control equipment (if any) is being operated and maintained according to the manufacturer's maintenance plan. These records shall include, but are not limited to the date, hour meter reading, action performed (e.g., engine oil and filter change/analysis, air filter inspection, hoses and belt inspection, etc.), name of the individual conducting maintenance and company affiliation. [40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

18. 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 Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-14-3

EXPIRATION DATE: 04/30/2025

EQUIPMENT DESCRIPTION:
THIELE PACKAGING LINE 4

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PERMIT UNIT REQUIREMENTS

1. Material Dispensing, Screening, and Conveying System, Thiele Line 4: This system includes enclosed material dispensing from any nineteen finished product storage bins into an enclosed belt conveyor that transfers the material through a diverter to another enclosed conveyor that delivers the product to another enclosed conveyor, which transfers the material into an enclosed shaker screen. The material (accepts) from the screen is pneumatically conveyed into the packaging line #4 hopper feeding the metering bin(s). The material from the metering bin(s) is dispensed into the packaging bags. The pneumatic conveying system consists of a filter receiver with a static sock. The fines (rejects) from the shaker screen are discharged into a tote in the basement. The tote shall have tight-fitting top lid with a static sock filter. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions, at the exhaust of pneumatic conveying system vent, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions, at the exhaust of each sock filter 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
4. PM10 emissions from the operations covered under this permit shall not exceed 0.00125 pounds per ton of material packaged. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No more than 1,200 tons of total material shall be packaged on this line in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The combined total amount of finished product packaged for all pet food packaging lines (N-8234-7, '-8, '-9, '-14) shall not exceed 1,200 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The owner or operator shall keep daily records of the date and combined total amount of product packaged (in tons) on packaging lines under permits N-8234-7, '-8, '-9 and '-14. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

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PERMIT UNIT: N-8234-19-1 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
CENTRALIZED VACUUM CLEANING SYSTEM FOR GENERAL HOUSEKEEPING SERVED BY 1,550 CFM AMERICAN VACUUM COMPANY DUST COLLECTOR WITH 299 SQ. FT. POLYESTER FILTER.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of the filtration system serving the centralized vacuum cleaning unit shall not equal or exceed 5% opacity for a period of periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All ducting and emissions control 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. The filtration system shall be maintained and operated according to manufacturer's specifications. The cleaning frequency and duration of the filtration system shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. A spare set of replacement filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The filtration system 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
8. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions from the filtration system serving the centralized vacuum cleaning unit shall not exceed 0.0004 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Records of all maintenance of the filtration system, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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ATTACHMENT B

Detailed Facility List

Detailed Facility Report

For Facility=8234 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

DIAMOND PET FOODS - RIPON
942 S STOCKTON AVE
RIPON, CA 95366

FAC # **N 8234**
STATUS: **A**
TELEPHONE:

TYPE: **TitleV**
TOXIC ID: **70202**

EXPIRE ON: 04/30/2025
AREA: 3 /
INSP. DATE: 10/23

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-8234-1-2	556 hp	3020-01 F	1	731.00	731.00	A	PET FOOD MATERIAL RECEIVING, STORAGE, AND LOAD OUT OPERATION
N-8234-2-6	563 hp, total electric motor hp	3020-01 F	1	731.00	731.00	A	PET FOOD MATERIAL DISPENSING, CONVEYING AND STORAGE OPERATIONS
N-8234-3-4	1,643 hp	3020-01 H	1	1,238.00	1,238.00	A	PET FOOD MATERIAL DISPENSING, MIXING, GRINDING AND SCREENING, EXTRUSION SURGE BINS, AND ASSOCIATED CONVEYING OPERATIONS
N-8234-4-12	17.7 MMBtu/hr	3020-02 H	1	1,238.00	1,238.00	A	PET FOOD PROCESSING LINE #1
N-8234-5-12	17.7 MMBtu/hr	3020-02 H	1	1,238.00	1,238.00	A	PET FOOD PROCESSING LINE #2
N-8234-6-12	17.7 MMBtu/hr	3020-02 H	1	1,238.00	1,238.00	A	PET FOOD PROCESSING LINE #3
N-8234-7-1	95 hp electric motors	3020-01 C	1	239.00	239.00	A	THIELE PACKAGING LINE 1
N-8234-8-1	95 hp electric motors	3020-01 C	1	239.00	239.00	A	THIELE PACKAGING LINE 2
N-8234-9-1	90 hp electric motors	3020-01 C	1	239.00	239.00	A	UVA PACKAGING LINE 3
N-8234-10-2	14.65 MMBTU/HR	3020-02 G	1	980.00	980.00	A	14.65 MMBTU/HR CLEAVER BROOKS CBLE 700-350, 150# BOILER EQUIPPED WITH CLEAVER BROOKS CB-350 LOW NOX BURNER VENTED TO C&C PANASIA MODEL PANOX CP-12 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM (BOILER #1)
N-8234-11-2	14.65 MMBTU/HR	3020-02 G	1	980.00	980.00	A	14.65 MMBTU/HR CLEAVER BROOKS CBLE 700-350, 150# BOILER EQUIPPED WITH CLEAVER BROOKS CB-350 LOW NOX BURNER VENTED TO C&C PANASIA MODEL PANOX CP-12 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM (BOILER #2)
N-8234-12-0	270 BHP IC ENGINE	3020-10 C	1	290.00	290.00	A	270 BHP CUMMINS MODEL 6CTA8.3F2 DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP
N-8234-14-0	90 hp electric motors	3020-01 C	1	239.00	239.00	A	THIELE PACKAGING LINE 4
N-8234-19-0	75 hp	3020-01 C	1	239.00	239.00	A	CENTRALIZED VACUUM CLEANING SYSTEM FOR GENERAL HOUSEKEEPING SERVED BY 1,550 CFM AMERICAN VACUUM COMPANY DUST COLLECTOR WITH 299 SQ. FT. POLYESTER FILTER.

Number of Facilities Reported: 1

ATTACHMENT C

Exempt Equipment

San Joaquin Valley
Unified Air Pollution Control District
Title V Application - INSIGNIFICANT ACTIVITIES

COMPANY NAME: Diamond Pet Foods - Ripon | FACILITY ID: **N - 8234**

Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.

Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1	
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1	√
Piston-type i.c.engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2	√
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3	
Space heating equipment other than boilers	6.1.4	√
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2	√
Use of less than 2 gal/day of graphic arts materials	6.3	
Equipment at retail establishments used to prepare food for human consumption	6.4.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5	
Containers used to store clean produced water	6.6.1	
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature <150 F	6.6.4	√
Containers used to store unheated organic material with an initial boiling point ≥ 302 F	6.6.5	√
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥0.9042	6.6.6	
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7	√

Exemption Category	Rule 2020 Citation	√
Containers used to store refined lubricating oils	6.6.8	√
Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	√
Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥0.8251	6.7.1.1	
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	
Equipment used to apply architectural coatings	6.8.1	√
Unheated, non-conveyorized cleaning equipment with < 10 ft^2 open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	
Brazing, soldering, or welding equipment	6.10	√
Equipment used to compress natural gas	6.11	
Fugitive emissions sources assoc. with exempt equipment	6.12	√
Pits and Ponds as defined in Rule 1020	6.15	
On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Emissions less than 2 lb/day from units not included above	6.19	
Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Non-structural repairs & maintenance to permitted equipment	7.3	√
Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

☐ No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

ATTACHMENT D

Permits to Operate

Permit to Operate

FACILITY: N-8234 **EXPIRATION DATE:** 04/30/2025

LEGAL OWNER OR OPERATOR: DIAMOND PET FOODS - RIPON
MAILING ADDRESS: 942 S STOCKTON AVE
RIPON, CA 95366

FACILITY LOCATION: 942 S STOCKTON AVE
RIPON, CA 95366

FACILITY DESCRIPTION: PET FOOD MANUFACTURING

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Samir Sheikh
Executive Director / APCO

Brian Clements
Director of Permit Services

Apr 25 2023 12:25PM -- KAHLONJ

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-1-2 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
PET FOOD MATERIAL RECEIVING, STORAGE, AND LOAD OUT OPERATION

PERMIT UNIT REQUIREMENTS

1. Receiving Equipment: Two rail car receiving pits (pit #1 and pit #2), one truck receiving pit (pit #3), four enclosed screw conveyors, two Prater scalpers, two enclosed belt conveyors, and two enclosed bucket elevators each feeding enclosed drag A and B screw conveyors. The rail car receiving pit (pit #1) and the truck receiving pit (pit #3) delivers the product to the enclosed screw conveyor from where the material transfers into a Prater scalper. The accepts from the scalper transfer to another enclosed screw conveyor to an enclosed belt conveyor that delivers the material into an enclosed bucket elevator (leg #2) feeding enclosed drag A and B screw conveyors that fills the silos and or bins mentioned in the storage equipment (below). The railcar receiving pit (pit #2) has a conveying mechanism set up identical to the rail car receiving pit (pit #1) and the truck receiving pit (pit #3). The rail car receiving pit (#1) and the truck pit (#3) uses a bucket elevator (leg #1). The rail car receiving pit (2) uses a bucket elevator (leg #2). Each receiving pit shall have a choke feed system. The rail car receiving pit (#1), the truck receiving pit (#3), Prater scalper, the bucket elevator (leg #1) all shall be vented to a CAMCORP Model 10TR10x100 baghouse. The rail car receiving pit (#2), Prater scalper, the enclosed elevators and the bucket elevator (leg #2) all shall be vented to another CAMCORP Model 10TR10x100 baghouse. [District Rule 2201]
2. Storage Equipment: Three 21,430 cubic feet each approx. 21.5' dia, 58.8' side wall silos and six 2,560 cubic feet each approx. 8' x 8' x 40' side wall in storage area A being fed by drag A enclosed screw conveyor, three 21,430 cubic feet each approx. 21.5' dia, 58.8' side wall and six 2,560 cubic feet each approx. 8' x 8' x 40' side wall in storage area B being fed by drag B enclosed screw conveyor. Each silo and bin shall be equipped with HORIZON SYSTEMS Model 21VFTC6 (or equal) cartridge dust collector system. [District Rule 2201]
3. The truck loadout spout shall have a sock filter to minimize entrainment of material dust into the atmosphere. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter, at exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
7. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
8. The total PM10 emissions from this permit unit shall not exceed 0.0015 pounds per ton of material received or loaded out. [District Rule 2201]
9. The combined amount of material received and loaded out shall not exceed 1,200 tons/day and 380,000 tons/year (12-month rolling basis). [District Rule 2201]
10. The owner or operator shall keep record of the date, amount of material received (in tons), and amount of material loaded out (in tons). [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The owner or operator shall keep monthly records of the total material received and loaded out under this permit. These monthly records shall be used to determine compliance with annual processing rate limit on a 12-month rolling basis. [District Rule 2201]
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-2-6 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
PET FOOD MATERIAL DISPENSING, CONVEYING AND STORAGE OPERATIONS

PERMIT UNIT REQUIREMENTS

1. Dispensing System: The material in three 21,430 cubic feet (each) silos in storage area A (East) shall be dispensed via enclosed reversible screw conveyors into enclosed drag conveyor(s) A-3 or A-4. The material in six 2,560 cubic feet (each) bins in storage area A (East) shall be dispensed into enclosed belt conveyor C. The material in three 21,430 cubic feet (each) silos in storage area B (West) shall be dispensed via enclosed reversible screw conveyors into enclosed drag conveyor(s) A-1 or A-2 and then dispensed into enclosed belt conveyor D. The material in six 2,560 cubic feet (each) bins in storage area B (West) is dispensed from the bins directly to the mill tower via enclosed transfer drag conveyor C or D. [District Rule 2201]
2. Conveying and Storage System: Enclosed drag conveyors C and D transfer material into enclosed bucket elevators (leg #3, leg #4, respectively) that feed any of the 75 bins in the mill tower. The enclosed bucket elevators (leg #3, leg #4), associated drag conveyors, and each mill tower bin shall be equipped with Horizon Systems Model 21VFTC6 (or equal) cartridge dust collector systems. [District Rule 2201]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. All exhaust stacks under this permit 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]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
7. Visible emissions at the exhaust of each dust collector system shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
8. PM10 emissions from material transfer and storage operations covered under this permit shall not exceed 0.00027 pounds per ton of material stored. [District Rule 2201]
9. No more than 1,100 tons/day and 280,000 tons/year (12-month rolling basis) of total material that is dispensed from outdoor silos/bins shall be transferred to storage bins in the mill tower. [District Rule 2201]
10. The owner or operator shall keep daily records of the total material transferred to storage bins in the mill tower. [District Rule 2201]
11. The owner or operator shall keep monthly records of the total material transferred to storage bins in the mill tower. These monthly records shall be used to determine compliance with annual processing rate limits on a 12-month rolling basis. [District Rule 2201]
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-3-4 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
PET FOOD MATERIAL DISPENSING, MIXING, GRINDING AND SCREENING, EXTRUSION SURGE BINS, AND ASSOCIATED CONVEYING OPERATIONS

PERMIT UNIT REQUIREMENTS

1. Dispensing System: The material is dispensed from the bins in the mill tower to their associated scale bins. There are 4 scale bins located under the 75 bins. Each scale services approximately 25% of the bins in the mill tower. The four scale bins dispense into a six ton dual ribbon mixer described in item the condition below. Each scale bin shall be equipped with HORIZON SYSTEMS Model 21VFTC6 (or equal) cartridge dust collector system. [District Rule 2201]
2. Mixing and Conveying System: The material in the 4 scale bins is dispensed into an enclosed six ton dual ribbon mixer. There is one mixer surge bin with a connected screw conveyor that transfers the material into another screw conveyor served by HORIZON SYSTEMS MODEL 21VFTC6 (or equal) dust collector system that either transfers the material into an enclosed bucket elevator feeding an enclosed transfer auger or a portion of the material into a truck loadout spout. The enclosed transfer auger feeds four surge bins one associated with each hammer mill. Each surge bin shall be equipped with HORIZON SYSTEMS MODEL 21VFTC6 (or equal) dust collector system. The truck loadout spout distributes product into a turn-head that services 4 unloading bins. Each unloading bin is vented with HORIZON SYSTEMS Model 21VFTC6 (or equal) dust collector system. The loadout spout of each unloading bin shall have an extended rubber sleeve to minimize entrainment of material dust into the atmosphere. [District Rule 2201]
3. Grinding, Screening, and Conveying System: There are four identical hammermill systems. Each system consists of a hammer mill feeding system, a hammermill, a hammermill plenum, and an enclosed screw conveyor. Each hammermill/plenum shall be equipped with MAC LST AIR 96LST196 (or equal) baghouse. The ground material from each hammermill system shall be pneumatically transferred using a filter receiver system into four sets of a paired extruder surge bin system (mentioned in the condition below). The displaced air from the filter receiver system shall be vented through a HORIZON SYSTEMS 40SWRDL 16 (or equal) baghouse. [District Rule 2201]
4. Extruder Surge Bins: Four sets of identical extruder surge bins, each set contains two bins, each with dimensions approx. 8' x 8' x 20', and each bin shall be equipped with HORIZON SYSTEMS MODEL 21VFTC6 (or equal) cartridge dust collector system. [District Rule 2201]
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. Particulate matter, at exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
7. All exhaust stacks under this permit 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]
8. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
9. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. PM10 emissions from each hammermill system shall not exceed 0.021 pounds per ton of material processed. [District Rule 2201]
11. The amount of material processed through each hammermill system shall not exceed 1,100 tons in any one day. [District Rule 2201]
12. The total material processed through all four hammermill systems shall not exceed 1,100 tons in any one day. [District Rule 2201]
13. PM10 emissions from the truck loadout operation shall not exceed 0.0009 pounds per ton of material loaded into trucks. [District Rule 2201]
14. No more than 800 tons of material shall be loaded into trucks using truck loadout spout in any one day. [District Rule 2201]
15. PM10 emissions from the material handling and transfer operations (except for material handling during truck loadout operations) shall not exceed 0.0003 pounds per ton of material handled. [District Rule 2201]
16. The total material handled & transferred by the operations covered under this permit shall not exceed 1,100 tons in any one day. [District Rule 2201]
17. The permittee shall keep records of the date, the amount of total material processed in hammermill systems, and the amount of material loaded into trucks. [District Rule 2201]
18. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-4-12 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
PET FOOD PROCESSING LINE #1

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. All exhaust stacks under this permit shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Material Dispensing, Kibble Manufacturing, and Conveying Systems: The material from the extruder surge bin is dispensed into an extruder bin from where the material is transferred into an EXTRU-TECH 24X144 steam-conditioner system. The material is extruded to form kibbles. The kibbles are pneumatically conveyed using HEPA filtered air into a dryer receiving chamber using HORIZON SYSTEMS HT-68 high volume cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the wet cyclone (Horizon HT-68) into the duct connected to the RTO. [District Rules 2201 and 4201]
6. Dryer System: The system consists of an EXTRU-TECH 1053-2P-AF11, 10 MMBtu/hr (total) direct-fired natural gas fired dryer with five drying sections, each section is equipped with an ECLIPSE WINNOX WX0200 burner with a maximum heat input rate of 2.0 MMBtu/hr. The dryer exhaust is vented to a MAC HE60 high efficiency cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the dryer cyclone (MAC HE60) into the duct connected to the RTO. [District Rules 2201 and 4102]
7. Cooler and Conveying System: The system consists of three cooler sections, all vented to a MAC high efficiency cyclone, a discharge conveyor for the transfer of dried kibbles into a hopper. The material from the hopper is pneumatically conveyed to an enclosed shaker screener. The owner or operator shall install and maintain a duct work to re-circulate the exhaust from the dryer cooler cyclone (MAC) into the Dryer System. [District Rules 2201 and 4102]
8. Fines Collection and Conveying System: This system collects fines from two locations in the dryer, the dryer cyclone discharge, and the cooler cyclone discharge, and vents these fines to a HORIZON SYSTEMS 28S WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201]
9. Screening and Conveying System. The system consists of an enclosed shaker screener, an enclosed surge bin, and an enclosed weigh belt. The fines (rejects) are dropped to the dumpsters. [District Rule 2201]
10. Coating and Conveying System: The system consists of a hopper where material from a weight belt is sprayed with chicken fat and canola oil (or other similar ingredients) and a coating reel where dry dog/cat digest and probiotics (or other similar ingredients) are sprinkled to be absorbed into the kibbles. The kibbles are then conveyed pneumatically to a vertical cooler system using a filter receiver system with a static sock filter. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Vertical Cooler and Conveying System: A vertical cooler vented to a MAC HE52 high efficiency cyclone. The dried material falls on a vibratory pan on sliding rails. The material (accepts) from the vibratory pan drops into a hopper from where the dried kibbles are pneumatically conveyed to the finished product bins. Each bin shall be vented to a static sock filter. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to a barrel. The owner or operator shall install and maintain a duct work to discharge exhaust from the vertical cooler cyclone (MAC HE 52) into the duct connected to the RTO. [District Rules 2201 and 4102]
12. The owner or operator shall install, operate and maintain three identical Durr Systems, Inc.'s Ecopure RL-60 regenerative thermal oxidizers (RTO) each equipped with 7.7 MMBtu/hr burner, associated duct work and control equipment, to abate pet food odors and reduce VOC emissions from all pet food manufacturing lines discharge stacks (wet cyclone (Horizon HT-68), dryer cyclone (MAC HE60) and vertical cooler cyclone (MAC HE52)). [District Rules 2201 and 4102]
13. Each RTO shall be equipped with non-resettable fuel flow meter(s) to measure natural gas fuel flow into each RTO. [District Rule 2201]
14. Each RTO's combustion chamber temperature shall be maintained at or above 1650 degrees Fahrenheit whenever odor abatement is occuring in the specific RTO. [District Rule 2201]
15. Each RTO's chamber shall be permanently equipped with temperature measurement devices to determine the average combustion chamber temperature. The combustion temperature shall be continuously monitored and recorded at least every 15-minutes whenever odor abatement is occuring in the specific RTO. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established RTO combustion chamber temperature. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201]
16. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
17. The dryer and RTO(s) shall only be fired on PUC-quality natural gas. [District Rule 2201]
18. PM10 emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.0306 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201]
19. The post control VOC emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.005 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201]
20. No more than 36 tons of fresh meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201]
21. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201]
22. The combined amount of finished product produced through all pet food manufacturing lines (N-8234-4, '-5 and '-6) shall not exceed 780 tons in any one day. [District Rule 2201]
23. Emissions from the dryer shall not exceed any of the following limits: 2.1 ppmvd NOx @ 19% O2 (0.024 lb-NOx/MMBtu), 16.5 ppmvd CO @ 19% O2 (0.112 lb-CO/MMBtu) and 0.00285 lb-SOx/MMBtu. [District Rules 2201 and 4309]
24. The RTO(s) shall reduce the VOC emissions (not including VOC emissions from natural gas combustion in the RTO) from pet food manufacturing operations by at least 95% (by weight). [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. The total NOx emissions from the three RTO unit system and three dryers combined shall not exceed any of the following limits: 8.343 lb/hr and 200.4 lb/day and 33,639 lb/yr (12-month rolling basis). Compliance with these mass emission rates shall be demonstrated using NOx (ppmvd) and exhaust gas flow rate (Q, dry standard cubic feet per minute, dscfm) data recorded by the CERMS, according to the following equation: Emissions (lb/hr) = (NOx ppmvd x 46 lb/lb-mol x 60 min/hr x Q (dscfm)) ÷ (379.5 dscf/lb-mol x 1000,000). Daily emissions for each RTO shall be calculated by summing the hourly emissions for the respective calendar day. Hourly or daily emissions data shall be used to calculate monthly emissions. Monthly data shall be used to calculate rolling 12-month totals. [District Rule 2201]

26. Emissions due to natural gas combustion in each RTO shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.88 lb-CO/MMBtu and 0.0055 lb-VOC/MMBtu. [District Rule 2201]

27. Heat input rate to each RTO shall not exceed any of the following limits: 184.8 MMBtu/day and 67,082 MMBtu/year (12-month rolling total). [District Rule 2201]

28. Combined total heat input rate to all three RTOs shall not exceed 156,816 MMBtu/year (12-month rolling total). [District Rule 2201]

29. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 of the dryer (at the exhaust stack of the MAC HE60 cyclone, upstream of the duct collecting discharge from other process streams), 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]

30. 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 Rules 2201 and 4309]

31. If either the dryer 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]

32. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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]

33. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

34. 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. 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 Rules 2201 and 4309]

36. 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 2201 and 4309]

37. Source testing to determine NOx and CO emissions from the dryer at the exhaust stack of the MAC HE60 cyclone by obtaining samples upstream of the duct collecting discharge from other process streams shall be conducted at least once every 24 months. [District Rule 4309]

38. All dryer 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]

39. Source testing to measure steady state NOx emissions at the exhaust of each RTO system shall be conducted within 60 days of initial startup under this permit and at least once every 24 months thereafter. All RTOs shall be operated and tested simultaneously while treating exhaust stream from the pet food manufacturing lines. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201]

40. NOx 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 2201 and 4309]

41. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 2201 and 4309]

42. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2201 and 4309]

43. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201]

44. For VOC source testing, one RTO system inlet and outlet may be sampled to determine compliance with various emission limits (i.e., VOC control efficiency, VOC emission limit) in this permit. The testing results may be substituted for the other RTO systems instead of sampling each RTO system. Failure to comply with any emission limit in this permit shall constitute violation of permits N-8234-4, '-5 and '-6. [District Rule 2201]

45. Source testing shall be conducted during an operating configuration representative of normal operations by selecting pet food recipe(s) that can be made continuously throughout the testing without any process interruptions or delays. Each pet food manufacturing line must be operated at or above 90% of the maximum hourly process rate of the chosen recipe. The pet food recipe chosen shall include at least 3% (by weight) of fresh meat. If multiple pet food lines are operated during the test, the operator must utilize the average production rate (tons of finished product produced) to demonstrate compliance with VOC emission limits (pounds per ton of finished product produced). [District Rule 2201 and 4102]

46. Source testing to determine compliance with process VOC emission limit (0.005 lb/ton of finished product produced) and VOC control efficiency (95% by weight) of the RTO shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rule 2201]

47. The process VOC emissions shall be calculated as follows: VOC (lb/hr) = VOCinlet of the RTO (lb/hr) - VOCoutlet of the RTO (lb/hr). VOCoutlet of the RTO (lb/hr) = VOCmeasured at the outlet of RTO (lb/hr) - VOCnatural gas combustion in the RTO (lb/hr). The resulting emissions shall be translated into lb/ton basis using the actual average hourly pet food production rate(s). Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

48. A presurvey must be done prior to source testing to determine VOC compound analytes present in the effluent streams from wet cyclone, dryer cyclone, and vertical cooler cyclone using the methodology described in EPA Method 18, Section 16. The presurvey shall be used to develop the appropriate sampling approach to ensure efficient collection of all VOCs present in the effluent and to develop a specific list of target compounds to be quantified during the subsequent total VOC source testing. VOC source testing shall be conducted using EPA Methods 18, 25, 25A, or 308. EPA Methods 25 or 25A can be used to determine the total VOCs only if the analyzer is calibrated with appropriate compound as determined during the presurvey, and the total carbon mass is scaled to the mole fraction of an appropriate compound, with the balance being scaled to the relative mole fraction of other the identified compounds. The Method 25 or 25A scaling factor shall be reported in the source test report and may be listed in the Permit to Operate for future testing (if any) required by the District. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. Upon approval from District's Compliance Division, data collected during previous presurveys of various effluent streams may be used to identify VOC compound analytes present in various effluent streams. [District Rule 2201]

49. The District may, at its discretion, require NOx, CO, VOC and PM10 source testing and odor panel testing at any time should conditions at the facility surrounding areas warrants such testing. [District Rules 2201 and 4201]

50. During each source test, the owner or operator shall keep track of all parameters that are used in demonstrating compliance with the limits in this permit, including, but not limited to: (1) date, (2) identification of pet food lines that are operated, (3) name of each recipe being produced, (4) amount of fresh meat injection rate, excluding moisture, into the steam-conditioner, (5) actual processing rate of finished product produced, tons/hour, (6) maximum hourly processing rate, tons/hour, for each recipe being produced, (7) RTO chamber temperature data (degrees Fahrenheit), (8) actual amount of fuel combusted in the dryer(s), (9) actual amount of fuel combusted in the RTO, and (10) CERMS data. [District Rules 2201 and 4102]

51. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

52. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Rate Monitoring System (CERMS) which continuously measures and records the exhaust gas NOx concentrations and exhaust flow rate, at the exhaust stack of each RTO system. CERMS shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CERMS passes the relative accuracy requirement specified herein during startups and shutdowns periods. If relative accuracy of CERMS cannot be demonstrated during startup or shutdown periods, CERMS results during startup and shutdown events shall be replaced with startup emission rates obtained during the previous NOx source testing conducted on January 24, 2019. [District Rules 1080 and 2201]

53. The CERMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rules 1080 and 2201]

54. The CERMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 for CEMS and Part 60, Appendix B Performance Specification 6 (PS6), or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rules 1080 and 2201]

55. In accordance with 40 CFR Part 60, Appendix F, NOx monitor must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rules 1080 and 2201]

56. The owner/operator shall perform a RATA for NOx (as specified in 40 CFR Part 60, Appendix F) and flow rate sensor at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the CERMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F for CEMS equipment. [District Rules 1080 and 2201]

57. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rules 1080 and 2201]

58. The CERMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rules 1080 and 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

59. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CERMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080]

60. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CERMS data polling software system and shall make CERMS data available to the District's automated polling system on a daily basis. [District Rule 1080]

61. Upon notice by the District that the facility's CERMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CERMS data is sent to the District by a District-approved alternative method. [District Rule 1080]

62. The permittee shall maintain the following records for CERMS equipment: (1) Date, time and duration of any malfunction; (2) Date of performance testing; (3) Date of evaluations, calibrations, checks, and adjustments; and (4) Date and time period for which CERMS was inoperative. [District Rule 1080]

63. The owner or operator shall maintain records of NOx emissions and submit a written report each calendar quarter to the District containing the following information for each operating day: (1) Calendar date; (2) The average hourly NOx emission rate (expressed as NO2, lb/hr) measured at the exhaust of each RTO; (3) The total average hourly NOx emission rate (expressed as NO2, lb/hr) for all three RTOs using average hourly NOx emission rate at the exhaust of each RTO (item 2); (4) The total daily NOx emission rates (lb/day) calculated at the end of each operating day from the measured total average hourly NOx emission rates; (5) The total monthly NOx emission rate (lb/month) calculated at the end of each month using total daily NOx emissions rate; (6) The total annual NOx emission rate (lb/year, on a rolling 12-month basis) calculated at the end of each month using total monthly NOx emission rate; (7) Identification of the operating days when the calculated total hourly average NOx emission rates are in excess of the permitted NOx emissions, with the reasons for such excess emissions as well as a description of corrective actions taken; (8) Identification of the operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (9) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding such data; (10) Identification of each parameter used in calculations; (11) Identification of the times when the pollutant concentration exceeded full span of the CERMS; (12) Description of any modifications to the CERMS that could affect the ability of the CERMS to comply with Performance Specification 6; (13) Results of daily CERMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60; and (14) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080 and 2201]

64. The owner or operator may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 2201]

65. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081]

66. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081]

67. The owner or operator shall notify the District of any breakdown condition (as defined in section 3.1 of District Rule 1100) 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

68. 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]

69. The owner or operator shall maintain daily records of the following items: (1) date, (2) name of the pet food recipe being produced, (3) RTO temperature monitoring data, (4) fresh meat injection rate, excluding moisture, into the steam conditioner (tons/day), (5) the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day), (6) amount of finished product produced by this line (tons/day); the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day) may be used to demonstrate compliance with the amount of finished product produced by this line (tons/day), (7) heat input rate to each RTO, in MMBtu/day and in MMBtu/year on a rolling 12 consecutive month period, (8) combined total heat input rate to all three RTOs in MMBtu/year on a rolling 12 consecutive month period, (9) combined process and combustion NOx emissions at the exhaust of each RTO (including the contribution of dryer NOx emissions) in lb/day and lb/year on a rolling 12 consecutive month period, and (10) combined process and combustion NOx emissions at the exhaust of all three RTOs (including the contribution of NOx emissions from dryers) in lb/year on a rolling 12 consecutive month period. [District Rule 2201]

70. Each RTO system (i.e., RTO, duct work, sensors, and other equipment) shall be installed, operated, and maintained per the manufacturer's (vendor) recommendations. A copy of manufacturer's recommendations shall be kept on site at all times. [District Rule 2201]

71. The owner or operator shall maintain all records of maintenance for each RTO system including date, RTO identification, reason for the maintenance, description of the maintenance activity, name of the individual performing the inspection and company affiliation. [District Rules 2201 and 4102]

72. All records shall be maintained and retained on-site for minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4309]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-5-12 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
PET FOOD PROCESSING LINE #2

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. All exhaust stacks under this permit shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Material Dispensing, Kibble Manufacturing, and Conveying Systems: The material from the extruder surge bin is dispensed into an extruder bin from where the material is transferred into an EXTRU-TECH 24X144 steam-conditioner system. The material is extruded to form kibbles. The kibbles are pneumatically conveyed using HEPA filtered air into a dryer receiving chamber using HORIZON SYSTEMS HT-68 high volume cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the wet cyclone (Horizon HT-68) into the duct connected to the RTO. [District Rules 2201 and 4201]
6. Dryer System: The system consists of an EXTRU-TECH 1053-2P-AF11, 10 MMBtu/hr (total) direct-fired natural gas fired dryer with five drying sections, each section is equipped with an ECLIPSE WINNOX WX0200 burner with a maximum heat input rate of 2.0 MMBtu/hr. The dryer exhaust is vented to a MAC HE60 high efficiency cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the dryer cyclone (MAC HE60) into the duct connected to the RTO. [District Rules 2201 and 4102]
7. Cooler and Conveying System: The system consists of three cooler sections, all vented to a MAC high efficiency cyclone, a discharge conveyor for the transfer of dried kibbles into a hopper. The material from the hopper is pneumatically conveyed to an enclosed shaker screener. The owner or operator shall install and maintain a duct work to re-circulate the exhaust from the dryer cooler cyclone (MAC) into the Dryer System. [District Rules 2201 and 4102]
8. Fines Collection and Conveying System: This system collects fines from two locations in the dryer, the dryer cyclone discharge, and the cooler cyclone discharge, and vents these fines to a HORIZON SYSTEMS 28S WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201]
9. Screening and Conveying System. The system consists of an enclosed shaker screener, an enclosed surge bin, and an enclosed weigh belt. The fines (rejects) are dropped to the dumpsters. [District Rule 2201]
10. Coating and Conveying System: The system consists of a hopper where material from a weight belt is sprayed with chicken fat and canola oil (or other similar ingredients) and a coating reel where dry dog/cat digest and probiotics (or other similar ingredients) are sprinkled to be absorbed into the kibbles. The kibbles are then conveyed pneumatically to a vertical cooler system using a filter receiver system with a static sock filter. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Vertical Cooler and Conveying System: A vertical cooler vented to a MAC HE52 high efficiency cyclone. The dried material falls on a vibratory pan on sliding rails. The material (accepts) from the vibratory pan drops into a hopper from where the dried kibbles are pneumatically conveyed to the finished product bins. Each bin shall be vented to a static sock filter. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to a barrel. The owner or operator shall install and maintain a duct work to discharge exhaust from the vertical cooler cyclone (MAC HE 52) into the duct connected to the RTO. [District Rules 2201 and 4102]
12. The owner or operator shall install, operate and maintain three identical Durr Systems, Inc.'s Ecopure RL-60 regenerative thermal oxidizers (RTO) each equipped with 7.7 MMBtu/hr burner, associated duct work and control equipment, to abate pet food odors and reduce VOC emissions from all pet food manufacturing lines discharge stacks (wet cyclone (Horizon HT-68), dryer cyclone (MAC HE60) and vertical cooler cyclone (MAC HE52)). [District Rules 2201 and 4102]
13. Each RTO shall be equipped with non-resettable fuel flow meter(s) to measure natural gas fuel flow into each RTO. [District Rule 2201]
14. Each RTO's combustion chamber temperature shall be maintained at or above 1650 degrees Fahrenheit whenever odor abatement is occuring in the specific RTO. [District Rule 2201]
15. Each RTO's chamber shall be permanently equipped with temperature measurement devices to determine the average combustion chamber temperature. The combustion temperature shall be continuously monitored and recorded at least every 15-minutes whenever odor abatement is occuring in the specific RTO. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established RTO combustion chamber temperature. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201]
16. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
17. The dryer and RTO(s) shall only be fired on PUC-quality natural gas. [District Rule 2201]
18. PM10 emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.0306 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201]
19. The post control VOC emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.005 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201]
20. No more than 36 tons of fresh meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201]
21. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201]
22. The combined amount of finished product produced through all pet food manufacturing lines (N-8234-4, '-5 and '-6) shall not exceed 780 tons in any one day. [District Rule 2201]
23. Emissions from the dryer shall not exceed any of the following limits: 2.1 ppmvd NOx @ 19% O2 (0.024 lb-NOx/MMBtu), 16.5 ppmvd CO @ 19% O2 (0.112 lb-CO/MMBtu) and 0.00285 lb-SOx/MMBtu. [District Rules 2201 and 4309]
24. The RTO(s) shall reduce the VOC emissions (not including VOC emissions from natural gas combustion in the RTO) from pet food manufacturing operations by at least 95% (by weight). [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. The total NOx emissions from the three RTO unit system and three dryers combined shall not exceed any of the following limits: 8.343 lb/hr and 200.4 lb/day and 33,639 lb/yr (12-month rolling basis). Compliance with these mass emission rates shall be demonstrated using NOx (ppmvd) and exhaust gas flow rate (Q, dry standard cubic feet per minute, dscfm) data recorded by the CERMS, according to the following equation: Emissions (lb/hr) = (NOx ppmvd x 46 lb/lb-mol x 60 min/hr x Q (dscfm)) ÷ (379.5 dscf/lb-mol x 1000,000). Daily emissions for each RTO shall be calculated by summing the hourly emissions for the respective calendar day. Hourly or daily emissions data shall be used to calculate monthly emissions. Monthly data shall be used to calculate rolling 12-month totals. [District Rule 2201]

26. Emissions due to natural gas combustion in each RTO shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.88 lb-CO/MMBtu and 0.0055 lb-VOC/MMBtu. [District Rule 2201]

27. Heat input rate to each RTO shall not exceed any of the following limits: 184.8 MMBtu/day and 67,082 MMBtu/year (12-month rolling total). [District Rule 2201]

28. Combined total heat input rate to all three RTOs shall not exceed 156,816 MMBtu/year (12-month rolling total). [District Rule 2201]

29. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 of the dryer (at the exhaust stack of the MAC HE60 cyclone, upstream of the duct collecting discharge from other process streams), 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]

30. 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 Rules 2201 and 4309]

31. If either the dryer 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]

32. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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]

33. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

34. 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. 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 Rules 2201 and 4309]

36. 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 2201 and 4309]

37. Source testing to determine NOx and CO emissions from the dryer at the exhaust stack of the MAC HE60 cyclone by obtaining samples upstream of the duct collecting discharge from other process streams shall be conducted at least once every 24 months. [District Rule 4309]

38. All dryer 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]

39. Source testing to measure steady state NOx emissions at the exhaust of each RTO system shall be conducted within 60 days of initial startup under this permit and at least once every 24 months thereafter. All RTOs shall be operated and tested simultaneously while treating exhaust stream from the pet food manufacturing lines. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201]

40. NOx 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 2201 and 4309]

41. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 2201 and 4309]

42. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2201 and 4309]

43. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201]

44. For VOC source testing, one RTO system inlet and outlet may be sampled to determine compliance with various emission limits (i.e., VOC control efficiency, VOC emission limit) in this permit. The testing results may be substituted for the other RTO systems instead of sampling each RTO system. Failure to comply with any emission limit in this permit shall constitute violation of permits N-8234-4, '-5 and '-6. [District Rule 2201]

45. Source testing shall be conducted during an operating configuration representative of normal operations by selecting pet food recipe(s) that can be made continuously throughout the testing without any process interruptions or delays. Each pet food manufacturing line must be operated at or above 90% of the maximum hourly process rate of the chosen recipe. The pet food recipe chosen shall include at least 3% (by weight) of fresh meat. If multiple pet food lines are operated during the test, the operator must utilize the average production rate (tons of finished product produced) to demonstrate compliance with VOC emission limits (pounds per ton of finished product produced). [District Rule 2201 and 4102]

46. Source testing to determine compliance with process VOC emission limit (0.005 lb/ton of finished product produced) and VOC control efficiency (95% by weight) of the RTO shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rule 2201]

47. The process VOC emissions shall be calculated as follows: VOC (lb/hr) = VOCinlet of the RTO (lb/hr) - VOCoutlet of the RTO (lb/hr). VOCoutlet of the RTO (lb/hr) = VOCmeasured at the outlet of RTO (lb/hr) - VOCnatural gas combustion in the RTO (lb/hr). The resulting emissions shall be translated into lb/ton basis using the actual average hourly pet food production rate(s). Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

48. A presurvey must be done prior to source testing to determine VOC compound analytes present in the effluent streams from wet cyclone, dryer cyclone, and vertical cooler cyclone using the methodology described in EPA Method 18, Section 16. The presurvey shall be used to develop the appropriate sampling approach to ensure efficient collection of all VOCs present in the effluent and to develop a specific list of target compounds to be quantified during the subsequent total VOC source testing. VOC source testing shall be conducted using EPA Methods 18, 25, 25A, or 308. EPA Methods 25 or 25A can be used to determine the total VOCs only if the analyzer is calibrated with appropriate compound as determined during the presurvey, and the total carbon mass is scaled to the mole fraction of an appropriate compound, with the balance being scaled to the relative mole fraction of other the identified compounds. The Method 25 or 25A scaling factor shall be reported in the source test report and may be listed in the Permit to Operate for future testing (if any) required by the District. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. Upon approval from District's Compliance Division, data collected during previous presurveys of various effluent streams may be used to identify VOC compound analytes present in various effluent streams. [District Rule 2201]

49. The District may, at its discretion, require NOx, CO, VOC and PM10 source testing and odor panel testing at any time should conditions at the facility surrounding areas warrants such testing. [District Rules 2201 and 4201]

50. During each source test, the owner or operator shall keep track of all parameters that are used in demonstrating compliance with the limits in this permit, including, but not limited to: (1) date, (2) identification of pet food lines that are operated, (3) name of each recipe being produced, (4) amount of fresh meat injection rate, excluding moisture, into the steam-conditioner, (5) actual processing rate of finished product produced, tons/hour, (6) maximum hourly processing rate, tons/hour, for each recipe being produced, (7) RTO chamber temperature data (degrees Fahrenheit), (8) actual amount of fuel combusted in the dryer(s), (9) actual amount of fuel combusted in the RTO, and (10) CERMS data. [District Rules 2201 and 4102]

51. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

52. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Rate Monitoring System (CERMS) which continuously measures and records the exhaust gas NOx concentrations and exhaust flow rate, at the exhaust stack of each RTO system. CERMS shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CERMS passes the relative accuracy requirement specified herein during startups and shutdowns periods. If relative accuracy of CERMS cannot be demonstrated during startup or shutdown periods, CERMS results during startup and shutdown events shall be replaced with startup emission rates obtained during the previous NOx source testing conducted on January 24, 2019. [District Rules 1080 and 2201]

53. The CERMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rules 1080 and 2201]

54. The CERMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 for CEMS and Part 60, Appendix B Performance Specification 6 (PS6), or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rules 1080 and 2201]

55. In accordance with 40 CFR Part 60, Appendix F, NOx monitor must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rules 1080 and 2201]

56. The owner/operator shall perform a RATA for NOx (as specified in 40 CFR Part 60, Appendix F) and flow rate sensor at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the CERMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F for CEMS equipment. [District Rules 1080 and 2201]

57. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rules 1080 and 2201]

58. The CERMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rules 1080 and 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

59. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CERMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080]

60. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CERMS data polling software system and shall make CERMS data available to the District's automated polling system on a daily basis. [District Rule 1080]

61. Upon notice by the District that the facility's CERMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CERMS data is sent to the District by a District-approved alternative method. [District Rule 1080]

62. The permittee shall maintain the following records for CERMS equipment: (1) Date, time and duration of any malfunction; (2) Date of performance testing; (3) Date of evaluations, calibrations, checks, and adjustments; and (4) Date and time period for which CERMS was inoperative. [District Rule 1080]

63. The owner or operator shall maintain records of NOx emissions and submit a written report each calendar quarter to the District containing the following information for each operating day: (1) Calendar date; (2) The average hourly NOx emission rate (expressed as NO2, lb/hr) measured at the exhaust of each RTO; (3) The total average hourly NOx emission rate (expressed as NO2, lb/hr) for all three RTOs using average hourly NOx emission rate at the exhaust of each RTO (item 2); (4) The total daily NOx emission rates (lb/day) calculated at the end of each operating day from the measured total average hourly NOx emission rates; (5) The total monthly NOx emission rate (lb/month) calculated at the end of each month using total daily NOx emissions rate; (6) The total annual NOx emission rate (lb/year, on a rolling 12-month basis) calculated at the end of each month using total monthly NOx emission rate; (7) Identification of the operating days when the calculated total hourly average NOx emission rates are in excess of the permitted NOx emissions, with the reasons for such excess emissions as well as a description of corrective actions taken; (8) Identification of the operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (9) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding such data; (10) Identification of each parameter used in calculations; (11) Identification of the times when the pollutant concentration exceeded full span of the CERMS; (12) Description of any modifications to the CERMS that could affect the ability of the CERMS to comply with Performance Specification 6; (13) Results of daily CERMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60; and (14) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080 and 2201]

64. The owner or operator may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 2201]

65. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081]

66. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081]

67. The owner or operator shall notify the District of any breakdown condition (as defined in section 3.1 of District Rule 1100) 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

68. 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]

69. The owner or operator shall maintain daily records of the following items: (1) date, (2) name of the pet food recipe being produced, (3) RTO temperature monitoring data, (4) fresh meat injection rate, excluding moisture, into the steam conditioner (tons/day), (5) the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day), (6) amount of finished product produced by this line (tons/day); the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day) may be used to demonstrate compliance with the amount of finished product produced by this line (tons/day), (7) heat input rate to each RTO, in MMBtu/day and in MMBtu/year on a rolling 12 consecutive month period, (8) combined total heat input rate to all three RTOs in MMBtu/year on a rolling 12 consecutive month period, (9) combined process and combustion NOx emissions at the exhaust of each RTO (including the contribution of dryer NOx emissions) in lb/day and lb/year on a rolling 12 consecutive month period, and (10) combined process and combustion NOx emissions at the exhaust of all three RTOs (including the contribution of NOx emissions from dryers) in lb/year on a rolling 12 consecutive month period. [District Rule 2201]

70. Each RTO system (i.e., RTO, duct work, sensors, and other equipment) shall be installed, operated, and maintained per the manufacturer's (vendor) recommendations. A copy of manufacturer's recommendations shall be kept on site at all times. [District Rule 2201]

71. The owner or operator shall maintain all records of maintenance for each RTO system including date, RTO identification, reason for the maintenance, description of the maintenance activity, name of the individual performing the inspection and company affiliation. [District Rules 2201 and 4102]

72. All records shall be maintained and retained on-site for minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4309]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-6-12 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
PET FOOD PROCESSING LINE #3

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.), shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. All exhaust stacks under this permit shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Material Dispensing, Kibble Manufacturing, and Conveying Systems: The material from the extruder surge bin is dispensed into an extruder bin from where the material is transferred into an EXTRU-TECH 24X144 steam-conditioner system. The material is extruded to form kibbles. The kibbles are pneumatically conveyed using HEPA filtered air into a dryer receiving chamber using HORIZON SYSTEMS HT-68 high volume cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the wet cyclone (Horizon HT-68) into the duct connected to the RTO. [District Rules 2201 and 4201]
6. Dryer System: The system consists of an EXTRU-TECH 1053-2P-AF11, 10 MMBtu/hr (total) direct-fired natural gas fired dryer with five drying sections, each section is equipped with an ECLIPSE WINNOX WX0200 burner with a maximum heat input rate of 2.0 MMBtu/hr. The dryer exhaust is vented to a MAC HE60 high efficiency cyclone. The owner or operator shall install and maintain a duct work to discharge exhaust from the dryer cyclone (MAC HE60) into the duct connected to the RTO. [District Rules 2201 and 4102]
7. Cooler and Conveying System: The system consists of three cooler sections, all vented to a MAC high efficiency cyclone, a discharge conveyor for the transfer of dried kibbles into a hopper. The material from the hopper is pneumatically conveyed to an enclosed shaker screener. The owner or operator shall install and maintain a duct work to re-circulate the exhaust from the dryer cooler cyclone (MAC) into the Dryer System. [District Rules 2201 and 4102]
8. Fines Collection and Conveying System: This system collects fines from two locations in the dryer, the dryer cyclone discharge, and the cooler cyclone discharge, and vents these fines to a HORIZON SYSTEMS 28S WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201]
9. Screening and Conveying System. The system consists of an enclosed shaker screener, an enclosed surge bin, and an enclosed weigh belt. The fines (rejects) are dropped to the dumpsters. [District Rule 2201]
10. Coating and Conveying System: The system consists of a hopper where material from a weight belt is sprayed with chicken fat and canola oil (or other similar ingredients) and a coating reel where dry dog/cat digest and probiotics (or other similar ingredients) are sprinkled to be absorbed into the kibbles. The kibbles are then conveyed pneumatically to a vertical cooler system using a filter receiver system with a static sock filter. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Vertical Cooler and Conveying System: A vertical cooler vented to a MAC HE52 high efficiency cyclone. The dried material falls on a vibratory pan on sliding rails. The material (accepts) from the vibratory pan drops into a hopper from where the dried kibbles are pneumatically conveyed to the finished product bins. Each bin shall be vented to a static sock filter. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to a barrel. The owner or operator shall install and maintain a duct work to discharge exhaust from the vertical cooler cyclone (MAC HE 52) into the duct connected to the RTO. [District Rules 2201 and 4102]
12. The owner or operator shall install, operate and maintain three identical Durr Systems, Inc.'s Ecopure RL-60 regenerative thermal oxidizers (RTO) each equipped with 7.7 MMBtu/hr burner, associated duct work and control equipment, to abate pet food odors and reduce VOC emissions from all pet food manufacturing lines discharge stacks (wet cyclone (Horizon HT-68), dryer cyclone (MAC HE60) and vertical cooler cyclone (MAC HE52)). [District Rules 2201 and 4102]
13. Each RTO shall be equipped with non-resettable fuel flow meter(s) to measure natural gas fuel flow into each RTO. [District Rule 2201]
14. Each RTO's combustion chamber temperature shall be maintained at or above 1650 degrees Fahrenheit whenever odor abatement is occuring in the specific RTO. [District Rule 2201]
15. Each RTO's chamber shall be permanently equipped with temperature measurement devices to determine the average combustion chamber temperature. The combustion temperature shall be continuously monitored and recorded at least every 15-minutes whenever odor abatement is occuring in the specific RTO. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established RTO combustion chamber temperature. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201]
16. Visible emissions, at the exhaust of each dust collector system (baghouse, cartridge dust collector, cyclone etc.) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
17. The dryer and RTO(s) shall only be fired on PUC-quality natural gas. [District Rule 2201]
18. PM10 emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.0306 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201]
19. The post control VOC emissions from the operations (not including natural gas combustion in the RTO) covered under this permit shall not exceed 0.005 pounds per ton of finished material produced. This emission limit includes process emissions, as well as, emissions from the natural gas combustion in the dryer. [District Rule 2201]
20. No more than 36 tons of fresh meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201]
21. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201]
22. The combined amount of finished product produced through all pet food manufacturing lines (N-8234-4, '-5 and '-6) shall not exceed 780 tons in any one day. [District Rule 2201]
23. Emissions from the dryer shall not exceed any of the following limits: 2.1 ppmvd NOx @ 19% O2 (0.024 lb-NOx/MMBtu), 16.5 ppmvd CO @ 19% O2 (0.112 lb-CO/MMBtu) and 0.00285 lb-SOx/MMBtu. [District Rules 2201 and 4309]
24. The RTO(s) shall reduce the VOC emissions (not including VOC emissions from natural gas combustion in the RTO) from pet food manufacturing operations by at least 95% (by weight). [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. The total NOx emissions from the three RTO unit system and three dryers combined shall not exceed any of the following limits: 8.343 lb/hr and 200.4 lb/day and 33,639 lb/yr (12-month rolling basis). Compliance with these mass emission rates shall be demonstrated using NOx (ppmvd) and exhaust gas flow rate (Q, dry standard cubic feet per minute, dscfm) data recorded by the CERMS, according to the following equation: Emissions (lb/hr) = (NOx ppmvd x 46 lb/lb-mol x 60 min/hr x Q (dscfm)) ÷ (379.5 dscf/lb-mol x 1000,000). Daily emissions for each RTO shall be calculated by summing the hourly emissions for the respective calendar day. Hourly or daily emissions data shall be used to calculate monthly emissions. Monthly data shall be used to calculate rolling 12-month totals. [District Rule 2201]

26. Emissions due to natural gas combustion in each RTO shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.88 lb-CO/MMBtu and 0.0055 lb-VOC/MMBtu. [District Rule 2201]

27. Heat input rate to each RTO shall not exceed any of the following limits: 184.8 MMBtu/day and 67,082 MMBtu/year (12-month rolling total). [District Rule 2201]

28. Combined total heat input rate to all three RTOs shall not exceed 156,816 MMBtu/year (12-month rolling total). [District Rule 2201]

29. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 of the dryer (at the exhaust stack of the MAC HE60 cyclone, upstream of the duct collecting discharge from other process streams), 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]

30. 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 Rules 2201 and 4309]

31. If either the dryer 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]

32. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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]

33. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

34. 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. 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 Rules 2201 and 4309]

36. 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 2201 and 4309]

37. Source testing to determine NOx and CO emissions from the dryer at the exhaust stack of the MAC HE60 cyclone by obtaining samples upstream of the duct collecting discharge from other process streams shall be conducted at least once every 24 months. [District Rule 4309]

38. All dryer 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]

39. Source testing to measure steady state NOx emissions at the exhaust of each RTO system shall be conducted within 60 days of initial startup under this permit and at least once every 24 months thereafter. All RTOs shall be operated and tested simultaneously while treating exhaust stream from the pet food manufacturing lines. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201]

40. NOx 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 2201 and 4309]

41. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 2201 and 4309]

42. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2201 and 4309]

43. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201]

44. For VOC source testing, one RTO system inlet and outlet may be sampled to determine compliance with various emission limits (i.e., VOC control efficiency, VOC emission limit) in this permit. The testing results may be substituted for the other RTO systems instead of sampling each RTO system. Failure to comply with any emission limit in this permit shall constitute violation of permits N-8234-4, '-5 and '-6. [District Rule 2201]

45. Source testing shall be conducted during an operating configuration representative of normal operations by selecting pet food recipe(s) that can be made continuously throughout the testing without any process interruptions or delays. Each pet food manufacturing line must be operated at or above 90% of the maximum hourly process rate of the chosen recipe. The pet food recipe chosen shall include at least 3% (by weight) of fresh meat. If multiple pet food lines are operated during the test, the operator must utilize the average production rate (tons of finished product produced) to demonstrate compliance with VOC emission limits (pounds per ton of finished product produced). [District Rule 2201 and 4102]

46. Source testing to determine compliance with process VOC emission limit (0.005 lb/ton of finished product produced) and VOC control efficiency (95% by weight) of the RTO shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 months. [District Rule 2201]

47. The process VOC emissions shall be calculated as follows: VOC (lb/hr) = VOCinlet of the RTO (lb/hr) - VOCoutlet of the RTO (lb/hr). VOCoutlet of the RTO (lb/hr) = VOCmeasured at the outlet of RTO (lb/hr) - VOCnatural gas combustion in the RTO (lb/hr). The resulting emissions shall be translated into lb/ton basis using the actual average hourly pet food production rate(s). Should the permittee decide to use a different test methodology, the methodology must be approved by the District. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

48. A presurvey must be done prior to source testing to determine VOC compound analytes present in the effluent streams from wet cyclone, dryer cyclone, and vertical cooler cyclone using the methodology described in EPA Method 18, Section 16. The presurvey shall be used to develop the appropriate sampling approach to ensure efficient collection of all VOCs present in the effluent and to develop a specific list of target compounds to be quantified during the subsequent total VOC source testing. VOC source testing shall be conducted using EPA Methods 18, 25, 25A, or 308. EPA Methods 25 or 25A can be used to determine the total VOCs only if the analyzer is calibrated with appropriate compound as determined during the presurvey, and the total carbon mass is scaled to the mole fraction of an appropriate compound, with the balance being scaled to the relative mole fraction of other the identified compounds. The Method 25 or 25A scaling factor shall be reported in the source test report and may be listed in the Permit to Operate for future testing (if any) required by the District. Should the permittee decide to use a different test methodology, the methodology must be approved by the District. Upon approval from District's Compliance Division, data collected during previous presurveys of various effluent streams may be used to identify VOC compound analytes present in various effluent streams. [District Rule 2201]

49. The District may, at its discretion, require NOx, CO, VOC and PM10 source testing and odor panel testing at any time should conditions at the facility surrounding areas warrants such testing. [District Rules 2201 and 4201]

50. During each source test, the owner or operator shall keep track of all parameters that are used in demonstrating compliance with the limits in this permit, including, but not limited to: (1) date, (2) identification of pet food lines that are operated, (3) name of each recipe being produced, (4) amount of fresh meat injection rate, excluding moisture, into the steam-conditioner, (5) actual processing rate of finished product produced, tons/hour, (6) maximum hourly processing rate, tons/hour, for each recipe being produced, (7) RTO chamber temperature data (degrees Fahrenheit), (8) actual amount of fuel combusted in the dryer(s), (9) actual amount of fuel combusted in the RTO, and (10) CERMS data. [District Rules 2201 and 4102]

51. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

52. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Rate Monitoring System (CERMS) which continuously measures and records the exhaust gas NOx concentrations and exhaust flow rate, at the exhaust stack of each RTO system. CERMS shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CERMS passes the relative accuracy requirement specified herein during startups and shutdowns periods. If relative accuracy of CERMS cannot be demonstrated during startup or shutdown periods, CERMS results during startup and shutdown events shall be replaced with startup emission rates obtained during the previous NOx source testing conducted on January 24, 2019. [District Rules 1080 and 2201]

53. The CERMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rules 1080 and 2201]

54. The CERMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 for CEMS and Part 60, Appendix B Performance Specification 6 (PS6), or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rules 1080 and 2201]

55. In accordance with 40 CFR Part 60, Appendix F, NOx monitor must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rules 1080 and 2201]

56. The owner/operator shall perform a RATA for NOx (as specified in 40 CFR Part 60, Appendix F) and flow rate sensor at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the CERMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F for CEMS equipment. [District Rules 1080 and 2201]

57. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rules 1080 and 2201]

58. The CERMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rules 1080 and 2201]

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59. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CERMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080]

60. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CERMS data polling software system and shall make CERMS data available to the District's automated polling system on a daily basis. [District Rule 1080]

61. Upon notice by the District that the facility's CERMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CERMS data is sent to the District by a District-approved alternative method. [District Rule 1080]

62. The permittee shall maintain the following records for CERMS equipment: (1) Date, time and duration of any malfunction; (2) Date of performance testing; (3) Date of evaluations, calibrations, checks, and adjustments; and (4) Date and time period for which CERMS was inoperative. [District Rule 1080]

63. The owner or operator shall maintain records of NOx emissions and submit a written report each calendar quarter to the District containing the following information for each operating day: (1) Calendar date; (2) The average hourly NOx emission rate (expressed as NO2, lb/hr) measured at the exhaust of each RTO; (3) The total average hourly NOx emission rate (expressed as NO2, lb/hr) for all three RTOs using average hourly NOx emission rate at the exhaust of each RTO (item 2); (4) The total daily NOx emission rates (lb/day) calculated at the end of each operating day from the measured total average hourly NOx emission rates; (5) The total monthly NOx emission rate (lb/month) calculated at the end of each month using total daily NOx emissions rate; (6) The total annual NOx emission rate (lb/year, on a rolling 12-month basis) calculated at the end of each month using total monthly NOx emission rate; (7) Identification of the operating days when the calculated total hourly average NOx emission rates are in excess of the permitted NOx emissions, with the reasons for such excess emissions as well as a description of corrective actions taken; (8) Identification of the operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (9) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding such data; (10) Identification of each parameter used in calculations; (11) Identification of the times when the pollutant concentration exceeded full span of the CERMS; (12) Description of any modifications to the CERMS that could affect the ability of the CERMS to comply with Performance Specification 6; (13) Results of daily CERMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60; and (14) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080 and 2201]

64. The owner or operator may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 2201]

65. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081]

66. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081]

67. The owner or operator shall notify the District of any breakdown condition (as defined in section 3.1 of District Rule 1100) 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

68. 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]

69. The owner or operator shall maintain daily records of the following items: (1) date, (2) name of the pet food recipe being produced, (3) RTO temperature monitoring data, (4) fresh meat injection rate, excluding moisture, into the steam conditioner (tons/day), (5) the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day), (6) amount of finished product produced by this line (tons/day); the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, tons/day) may be used to demonstrate compliance with the amount of finished product produced by this line (tons/day), (7) heat input rate to each RTO, in MMBtu/day and in MMBtu/year on a rolling 12 consecutive month period, (8) combined total heat input rate to all three RTOs in MMBtu/year on a rolling 12 consecutive month period, (9) combined process and combustion NOx emissions at the exhaust of each RTO (including the contribution of dryer NOx emissions) in lb/day and lb/year on a rolling 12 consecutive month period, and (10) combined process and combustion NOx emissions at the exhaust of all three RTOs (including the contribution of NOx emissions from dryers) in lb/year on a rolling 12 consecutive month period. [District Rule 2201]

70. Each RTO system (i.e., RTO, duct work, sensors, and other equipment) shall be installed, operated, and maintained per the manufacturer's (vendor) recommendations. A copy of manufacturer's recommendations shall be kept on site at all times. [District Rule 2201]

71. The owner or operator shall maintain all records of maintenance for each RTO system including date, RTO identification, reason for the maintenance, description of the maintenance activity, name of the individual performing the inspection and company affiliation. [District Rules 2201 and 4102]

72. All records shall be maintained and retained on-site for minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4309]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-7-1 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
THIELE PACKAGING LINE 1

PERMIT UNIT REQUIREMENTS

1. Material Dispensing, Screening, and Conveying System, Thiele Line 1: This system includes enclosed material dispensing from any nineteen finished product storage bins into an enclosed belt conveyor that transfers the material into an enclosed shaker screen. The material (accepts) from the screen is pneumatically conveyed into the packaging line #1 hopper feeding the metering bin(s). The material from the metering bin(s) is dispensed into the packaging bags. The pneumatic conveying system consists of a filter receiver with a static sock. The fines (rejects) from the shaker screen are discharged into a tote in the basement. The tote shall have tight-fitting top lid with a static sock filter. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions, at the exhaust of pneumatic conveying system vent, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Visible emissions, at the exhaust of each sock filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
6. PM10 emissions from the operations covered under this permit shall not exceed 0.0011 pounds per ton of material packaged. [District Rule 2201]
7. No more than 1,200 tons of total material shall be packaged on this line in any one day. [District Rule 2201]
8. The combined total amount of finished product packaged for all pet food packaging lines (N-8234-7, '-8, '-9, '-14) shall not exceed 1,200 tons in any one day. [District Rule 2201]
9. The owner or operator shall keep daily records of the date and combined total amount of product packaged (in tons) on packaging lines under permits N-8234-7, '-8, '-9 and '-14. [District Rule 2201]
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-8-1 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
THIELE PACKAGING LINE 2

PERMIT UNIT REQUIREMENTS

1. Material Dispensing, Screening, and Conveying System, Thiele Line 2: This system includes enclosed material dispensing from any nineteen finished product storage bins into an enclosed belt conveyor that transfers the material into an enclosed shaker screen. The material (accepts) from the screen is pneumatically conveyed into the packaging line #2 hopper feeding the metering bin(s). The material from the metering bin(s) is dispensed into the packaging bags. The pneumatic conveying system consists of a filter receiver with a static sock. The fines (rejects) from the shaker screen are discharged into a tote in the basement. The tote shall have tight-fitting top lid with a static sock filter. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions, at the exhaust of pneumatic conveying system vent, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Visible emissions, at the exhaust of each sock filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
6. PM10 emissions from the operations covered under this permit shall not exceed 0.0011 pounds per ton of material packaged. [District Rule 2201]
7. No more than 1,200 tons of total material shall be packaged on this line in any one day. [District Rule 2201]
8. The combined total amount of finished product packaged for all pet food packaging lines (N-8234-7, '-8, '-9, '-14) shall not exceed 1,200 tons in any one day. [District Rule 2201]
9. The owner or operator shall keep daily records of the date and combined total amount of product packaged (in tons) on packaging lines under permits N-8234-7, '-8, '-9 and '-14. [District Rule 2201]
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-9-1 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
UVA PACKAGING LINE 3

PERMIT UNIT REQUIREMENTS

1. Material Dispensing, Screening, and Conveying System, UVA Line 3: This system includes enclosed material dispensing from any nineteen finished product storage bins into an enclosed belt conveyor that transfers the material into a diverter of another enclosed conveyor, which transfers the material into an enclosed shaker screen. The material (accepts) from the screen is pneumatically conveyed into the packaging line #3 hopper. The material from the hopper is dispensed into an enclosed conveyor that delivers the product into another enclosed conveyor feeding the metering bin(s). The material from the metering bin(s) is dispensed into the packaging bags. The pneumatic conveying system consists of a filter receiver with a static sock. The fines (rejects) from the shaker screen are discharged into a tote in the basement. The tote shall have tight-fitting top lid with a static sock filter. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions, at the exhaust of pneumatic conveying system vent, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Visible emissions, at the exhaust of each sock filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
6. PM10 emissions from the operations covered under this permit shall not exceed 0.0015 pounds per ton of material packaged. [District Rule 2201]
7. No more than 1,200 tons of total material shall be packaged on this line in any one day. [District Rule 2201]
8. The combined total amount of finished product packaged for all pet food packaging lines (N-8234-7, '-8, '-9, '-14) shall not exceed 1,200 tons in any one day. [District Rule 2201]
9. The owner or operator shall keep daily records of the date and combined total amount of product packaged (in tons) on packaging lines under permits N-8234-7, '-8, '-9 and '-14. [District Rule 2201]
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

PERMIT UNIT: N-8234-10-2 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
14.65 MMBTU/HR CLEAVER BROOKS CBLE 700-350, 150# BOILER EQUIPPED WITH CLEAVER BROOKS CB-350 LOW NOX BURNER VENTED TO C&C PANASIA MODEL PANOX CP-12 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM (BOILER #1)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.48c(g)]
7. The combined total heat input rate to the boilers under permits N-8234-10 and N-8234-11 shall not exceed 128,334 MMBtu in any 12 consecutive month rolling period. [District Rule 2201]
8. NOx emissions shall not exceed 9.0 ppmvd @ 3% O2 (0.011 lb/MMBtu) referenced as NO2. [District Rules 2201, 4305, 4306 and 4320]
9. CO emissions shall not exceed 50 ppmvd @ 3% O2 (0.037 lb/MMBtu). [District Rules 2201, 4305, 4306 and 4320]
10. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
11. PM10 emissions shall not exceed 0.003 lb/MMBtu. [District Rule 2201]
12. VOC emissions shall not exceed 0.004 lb/MMBtu. [District Rule 2201]
13. NH3 emissions from the SCR shall not exceed 10.0 ppmvd @ 3% O2. [District Rule 2201]
14. 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]
15. Source testing to measure NOx, CO, and NH3 emissions from this unit while fired on natural gas shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests when unit is fired on natural gas, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 2201, 4305, 4306 and 4320]
16. NOx 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320]

18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320]

19. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081]

20. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320]

21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

22. 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]

23. 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]

24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

25. The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing gas detection tubes (Draeger brand or District approved equivalent). 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 it has been performed within the last month. [District Rules 2201, 4305, 4306 and 4320]

26. If either the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 Rules 2201, 4305, 4306 and 4320]

27. All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 2201, 4305, 4306 and 4320]

28. Ammonia emissions readings shall be conducted at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 2201, 4305 and 4306]

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306 and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

30. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]

31. The permittee shall maintain monthly records of the type of fuel and the amount of the fuel combusted (scf/month) by the boiler. [40 CFR 60.48c(g)]

32. The permittee shall maintain monthly records of the total heat input rate (MMBtu) to the boilers under permits N-8234-10 and N-8234-11 in the previous 12 consecutive months. [District Rule 2201]

33. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4305, 4306 and 4320]

34. Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-11-2 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
14.65 MMBTU/HR CLEAVER BROOKS CBLE 700-350, 150# BOILER EQUIPPED WITH CLEAVER BROOKS CB-350 LOW NOX BURNER VENTED TO C&C PANASIA MODEL PANOX CP-12 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM (BOILER #2)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.48c(g)]
7. The combined total heat input rate to the boilers under permits N-8234-10 and N-8234-11 shall not exceed 128,334 MMBtu in any 12 consecutive month rolling period. [District Rule 2201]
8. NOx emissions shall not exceed 9.0 ppmvd @ 3% O2 (0.011 lb/MMBtu) referenced as NO2. [District Rules 2201, 4305, 4306 and 4320]
9. CO emissions shall not exceed 50 ppmvd @ 3% O2 (0.037 lb/MMBtu). [District Rules 2201, 4305, 4306 and 4320]
10. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
11. PM10 emissions shall not exceed 0.003 lb/MMBtu. [District Rule 2201]
12. VOC emissions shall not exceed 0.004 lb/MMBtu. [District Rule 2201]
13. NH3 emissions from the SCR shall not exceed 10.0 ppmvd @ 3% O2. [District Rule 2201]
14. 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]
15. Source testing to measure NOx, CO, and NH3 emissions from this unit while fired on natural gas shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests when unit is fired on natural gas, the unit shall be tested not less than once every thirty-six 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 months. [District Rules 2201, 4305, 4306 and 4320]
16. NOx 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320]

18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320]

19. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081]

20. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320]

21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

22. 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]

23. 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]

24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

25. The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing gas detection tubes (Draeger brand or District approved equivalent). 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 it has been performed within the last month. [District Rules 2201, 4305, 4306 and 4320]

26. If either the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 Rules 2201, 4305, 4306 and 4320]

27. All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 2201, 4305, 4306 and 4320]

28. Ammonia emissions readings shall be conducted at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 2201, 4305 and 4306]

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306 and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

30. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]

31. The permittee shall maintain monthly records of the type of fuel and the amount of the fuel combusted (scf/month) by the boiler. [40 CFR 60.48c(g)]

32. The permittee shall maintain monthly records of the total heat input rate (MMBtu) to the boilers under permits N-8234-10 and N-8234-11 in the previous 12 consecutive months. [District Rule 2201]

33. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4305, 4306 and 4320]

34. Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-12-0 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
270 BHP CUMMINS MODEL 6CTA8.3F2 DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. The engine shall be equipped with a turbocharger and with an aftercooler. [District NSR Rule]
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. Emissions shall not exceed any of the following: NOx, 6.03 g/hp-hr; CO, 1.79 g/hp-hr; VOC, 0.76 g/hp-hr; PM10, 0.25 g/hp-hr. [District NSR Rule]
7. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
8. This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115]
9. 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]
10. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
11. 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 and 17 CCR 93115]
12. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. This engine shall not be operated for maintenance and testing purposes between 7:30 a.m. and 3:30 p.m. on days when school is in session. [17 CCR 93115]
14. This engine shall not be operated for maintenance and testing purposes whenever there is a school sponsored activity. [17 CCR 93115]
15. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-14-0 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
THIELE PACKAGING LINE 4

PERMIT UNIT REQUIREMENTS

1. Material Dispensing, Screening, and Conveying System, Thiele Line 4: This system includes enclosed material dispensing from any nineteen finished product storage bins into an enclosed belt conveyor that transfers the material through a diverter to another enclosed conveyor that delivers the product to another enclosed conveyor, which transfers the material into an enclosed shaker screen. The material (accepts) from the screen is pneumatically conveyed into the packaging line #4 hopper feeding the metering bin(s). The material from the metering bin(s) is dispensed into the packaging bags. The pneumatic conveying system consists of a filter receiver with a static sock. The fines (rejects) from the shaker screen are discharged into a tote in the basement. The tote shall have tight-fitting top lid with a static sock filter. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions, at the exhaust of pneumatic conveying system vent, shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Visible emissions, at the exhaust of each sock filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
6. PM10 emissions from the operations covered under this permit shall not exceed 0.00125 pounds per ton of material packaged. [District Rule 2201]
7. No more than 1,200 tons of total material shall be packaged on this line in any one day. [District Rule 2201]
8. The combined total amount of finished product packaged for all pet food packaging lines (N-8234-7, '-8, '-9, '-14) shall not exceed 1,200 tons in any one day. [District Rule 2201]
9. The owner or operator shall keep daily records of the date and combined total amount of product packaged (in tons) on packaging lines under permits N-8234-7, '-8, '-9 and '-14. [District Rule 2201]
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-19-0 **EXPIRATION DATE:** 04/30/2025

EQUIPMENT DESCRIPTION:
CENTRALIZED VACUUM CLEANING SYSTEM FOR GENERAL HOUSEKEEPING SERVED BY 1,550 CFM AMERICAN VACUUM COMPANY DUST COLLECTOR WITH 299 SQ. FT. POLYESTER FILTER.

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Visible emissions from the exhaust of the filtration system serving the centralized vacuum cleaning unit shall not equal or exceed 5% opacity for a period of periods aggregating more than three minutes in any one hour. [District Rule 2201]
5. All ducting and emissions control 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]
6. The filtration system shall be maintained and operated according to manufacturer's specifications. The cleaning frequency and duration of the filtration system shall be adjusted to optimize the control efficiency. [District Rule 2201]
7. A spare set of replacement filters shall be maintained on the premises at all times. [District Rule 2201]
8. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The filtration system 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]
10. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201]
11. PM10 emissions from the filtration system serving the centralized vacuum cleaning unit shall not exceed 0.0004 gr/dscf. [District Rule 2201]
12. Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. [District Rule 2201]
13. Records of all maintenance of the filtration system, including all change outs of filter media, shall be maintained. [District Rule 2201]
14. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201]

ATTACHMENT E

HAP Calculations

Summary of Hazardous Air Pollutants
Diamond Pet Foods - Ripon
(N-8234)

Substances	N-8234-4, '-5 & '-6 (3-Dryers)	N-8234-10 & '-11 (Boilers)	N-8234-12 (Fire-pump Engine)	3-RTOs	Total, all permit units (lb/yr)	HAP?	HAP, Total of all permit units (lb/yr)	
1,3 Butadiene	--	--	0.1	--	0.1	Y	0.1	
Acetaldehyde	0.8	0.4	0.3	6.7	7.4	Y	7.4	
Acrolein	0.7	0.3	0	1.6	1.9	Y	1.9	
Arsenic	--	--	0	--	0	Y	0	
Benzene	1.5	0.7	0.1	24.9	25.7	Y	25.7	
Cadmium	--	--	0	--	0	Y	0	
Chlorobenzene	--	--	0	--	0	Y	0	
Chromium	--	--	0	--	0	Y	0	
Copper	--	--	0	--	0			
Ethyl Benzene	1.8	0.9	0	226.4	227.3	Y	227.3	
Formaldehyde	3.2	1.6	0.7	183.3	185.6	Y	185.6	
Hexane	1.2	0.6	0	4.5	5.1	Y	5.1	
Hexavalent Chromium	--	--	0	--	0	Y	0	
Hydrogen Chloride	--	--	0.1	--	0.1	Y	0.1	
Lead	--	--	0	--	0	Y	0	
Manganese	--	--	0	--	0	Y	0	
Mercury	--	--	0	--	0	Y	0	
Naphthalene	0.1	0	0	1.7	1.7	Y	1.7	
Nickel	--	--	0	--	0	Y	0	
PAHs	0	0	0	0.5	0.5	Y	0.5	
Propylene	139.3	68	0.2	382.6	450.8			
Selenium	--	--	0	--	0	Y	0	
Toluene	7	3.4	0	9.1	12.5	Y	12.5	
Xylenes	5.2	2.5	0	4.5	7	Y	7	
Zinc	--	--	0	--	0			
						Total:	**474.9**	**lb/yr**
							0.2	**tons/yr**

N-8234-4, 5, 6 (3 Dryers)

Substances	CAS#	EF (lb/MMscf)*	**Emissions PE (lb/yr)
Acetaldehyde	75070	3.10E-03	0.8
Acrolein	107028	2.70E-03	0.7
Benzene	71432	5.80E-03	1.5
Ethyl Benzene	100414	6.90E-03	1.8
Formaldehyde	50000	1.23E-02	3.2
Hexane	110543	4.60E-03	1.2
Naphthalene	91203	3.00E-04	0.1
PAHs	1151	1.00E-04	0.0
Propylene	115071	5.30E-01	139.3
Toluene	108883	2.65E-02	7.0
Xylenes	1330207	1.97E-02	5.2
References:			
*The emission factors are from the table, "Natural Gas Fired External Combustion Equipment" in the May 2001 update of VCAPCD AB 2588 Combustion Emission Factors. PAHs emission factor adjusted			
**Emissions PE (lb/yr) = EF (lb/MMscf) x 10 MMBtu/hr-dryer x 3 dryers x 8,760 hr/yr x scf/1,000 Btu; Heat input rate to each dryer is 10 MMBtu/hr; higher heating value of natural gas is assumed to be 1,000 Btu/scf (District practice).			

N-8234-10 & 11 (2 Boilers)

Substances	CAS#	EF (lb/MMscf)*	**Emissions PE (lb/yr)
Acetaldehyde	75070	3.10E-03	0.4
Acrolein	107028	2.70E-03	0.3
Benzene	71432	5.80E-03	0.7
Ethyl Benzene	100414	6.90E-03	0.9
Formaldehyde	50000	1.23E-02	1.6
Hexane	110543	4.60E-03	0.6
Naphthalene	91203	3.00E-04	0.0
PAHs	1151	1.00E-04	0.0
Propylene	115071	5.30E-01	68.0
Toluene	108883	2.65E-02	3.4
Xylenes	1330207	1.97E-02	2.5
References:			
*The emission factors are from the table, "Natural Gas Fired External Combustion Equipment" in the May 2001 update of VCAPCD AB 2588 Combustion Emission Factors. PAHs emission factor adjusted			
**Emissions PE (lb/yr) = EF (lb/MMscf) x 128,334 MMBtu/yr x scf/1,000 Btu; Heat input rate to both boilers is limited to 128,334 MMBtu/yr; higher heating value of natural gas is assumed to be 1,000 Btu/scf (District practice).			

N-8234-12 (1 Engine)

Substances	CAS#	*EF (lbs/ 1,000 gallons)	**Emissions PE (lb/yr)
1,3 Butadiene	106990	2.17E-01	0.1
Acetaldehyde	75070	7.83E-01	0.3
Acrolein	107028	3.39E-02	0.0
Arsenic	7440382	1.60E-03	0.0
Benzene	71432	1.86E-01	0.1
Cadmium	7440439	1.50E-03	0.0
Chlorobenzene	108907	2.00E-04	0.0
Chromium	7440473	6.00E-04	0.0
Copper	7440508	4.10E-03	0.0
Ethyl Benzene	100414	1.09E-02	0.0
Formaldehyde	50000	1.73E+00	0.7
Hexane	110543	2.69E-02	0.0
Hexavalent Chromium	18540299	1.00E-04	0.0
Hydrogen Chloride	7647010	1.86E-01	0.1
Lead	7439921	8.30E-03	0.0
Manganese	7439965	3.10E-03	0.0
Mercury	7439976	2.00E-03	0.0
Naphthalene	91203	1.97E-02	0.0
Nickel	7440020	3.90E-03	0.0
PAHs	1150	5.59E-02	0.0
Propylene	115071	4.67E-01	0.2
Selenium	7782492	2.20E-03	0.0
Toluene	108883	1.05E-01	0.0
Xylenes	1330207	4.24E-02	0.0
Zinc	7440666	2.24E-02	0.0
References:			
* The emission factors were based on the May 2001 update of VCAPCD AB 2588 Combustion Emission Factors			
**Emissions PE (lb/yr) = EF (lb-pollutant)/1,000 gal x 429.5 gal/yr; Fuel use = 14.32 gal/hr x30 hr/yr (permitted non-emergency use) = 429.5 gal/yr			

3 RTOs

Substances	CAS#	EF (lb/MMscf)*	**Emissions PE (lb/yr)
Acetaldehyde	75070	4.30E-02	6.7
Acrolein	107028	1.00E-02	1.6
Benzene	71432	1.59E-01	24.9
Ethyl Benzene	100414	1.44E+00	226.4
Formaldehyde	50000	1.17E+00	183.3
Hexane	110543	2.90E-02	4.5
Naphthalene	91203	1.10E-02	1.7
PAHs	1151	3.00E-03	0.5
Propylene	115071	2.44E+00	382.6
Toluene	108883	5.80E-02	9.1
Xylenes	1330207	2.90E-02	4.5
References:			
*The emission factors are from the table, "Natural Gas Fired External Combustion Equipment" in the May 2001 update of VCAPCD AB 2588 Combustion Emission Factors. PAHs emission factor adjusted			
**Emissions PE (lb/yr) = EF (lb/MMscf) x 156,816 MMBtu/yr x scf/1,000 Btu; combined heat input rate to all three RTOs is limited to 156,816 MMBtu/yr; higher heating value of natural gas is assumed to be 1,000 Btu/scf (District practice).			