San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

MAR 12 2015

Mark Ferguson
Diamond Pet Food Processors of Ripon
942 S Stockton Ave
Ripon, CA 95366

RE: Notice of Final Action - Authority to Construct
Facility Number: N-8234
Project Number: N-1143145

Dear Mr. Ferguson:

The Air Pollution Control Officer has issued the Authority to Construct permits to Diamond Pet Food Processors of Ripon for establishing emission limits for the pet food manufacturing operations, at 942 South Stockton Ave, Ripon. Enclosed are the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permits was published on January 26, 2015. The District's analysis of the proposal was also sent to CARB on January 21, 2015. All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in clarifying permit requirements on ground meat injection rate and associated recordkeeping. These changes were minor and did not trigger additional public notification requirements, nor did they have any impact upon the Best Available Control Technology determination or on the amount of offsets required for project approval.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce at (209) 557-6400.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM: JK/ya

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email

Comments from Diamond Pet Food Processors of Ripon

Comment #1:

Diamond submitted a comment that the ground meat injection rate into the steam conditioner should exclude the moisture in the meat. Diamond claims the fresh meat injection rate provided in the previous permitting actions excludes the moisture in the meat, and the condition #19 and #46 in the draft permit N-8234-4-2, '-5-2 and '-6-2 should explicitly reflect this matter.

Diamond states:

"....the ground meat injection rate of 36 tons/day provided by Diamond was based on the quantity of moisture excluded ground meat. Diamond tracks the amount of ground meat injected to the steam-conditioner by subtracting the moisture content from the total quantity of meat delivered. The moisture content is determined based on the average moisture content as provided by the supplier. Since the draft ATCs do not include a clarification that the 36 tons/day of ground meat injection rate excludes moisture content, we request the following modifications be made to permit conditions 19 and 46 for the pet food production lines (additional language underlined):

19. No more than 36 tons of ground meat, <u>excluding moisture</u>, shall be injected into the steam conditioner in any one day. [District Rule 2201]

46. The owner or operator shall maintain records of the date, the ground meat injection rate, <u>excluding moisture</u>, into the steam conditioner (tons/day), amount of finished product produced by this line (tons/day), and the combined amount of finished product produced by all pet <u>food</u> manufacturing lines (N-8234-4, '-5 and '-6, tons/day). The combined amount of finished product produced by all pet <u>food</u> 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). [District Rule 2201]"

Response:
The documents under a previous permitting action (project N-1103242) indicate that the fresh meat injection rate was estimated using the proposed finished product produced under each pet food manufacturing line; therefore, it is believed that the fresh meat injection rate provided by Diamond excluded the moisture in the fresh meat. Therefore, underlined changes are being made to condition #19 and #46 in the draft permit N-8234-4-2, '-5-2 and '-6-2 as a result of this comment.

19. No more than 36 tons of ground meat, <u>excluding moisture</u>, shall be injected into the steam-conditioner in any one day. [District Rule 2201]

46. The owner or operator shall maintain records of the date, the ground meat injection rate, <u>excluding moisture</u>, into the steam conditioner (tons/day), amount of finished

product produced by this line (tons/day), and the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, 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). [District Rule 2201]

The changes to the above conditions will not change the BACT or Offset determinations; therefore, this project does not need to be re-noticed to ARB or the public.

Comments from California Air Resources Board (CARB)

CARB has no comments on this project.

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: N-8234-4-2 **ISSUANCE DATE:** 03/10/2015

LEGAL OWNER OR OPERATOR: DIAMOND PET FOOD PROCESSORS OF RIPON
MAILING ADDRESS: 942 SOUTH STOCKTON AVENUE
RIPON, CA 95366

LOCATION: 942 SOUTH STOCKTON AVENUE
RIPON, CA 95366

EQUIPMENT DESCRIPTION:
MODIFICATION OF: PET FOOD PROCESSING LINE #1: TO ESTABLISH A COMBINED NOX EMISSION LIMIT OF 0.471 LB/HR AND RE-ESTABLISH VOC EMISSION FACTOR TO 0.047 LB/TON OF FINISHED PRODUCT

CONDITIONS

1. This Authority to Construct (ATC) permit cancels and replaces the ATC N-8234-4-1. [District Rule 2201]
2. 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 with a static sock filter. The owner or operator shall install, maintain, and operate Uniqair's, 6kW, 6 plasma cylinders, cold plasma injection system to abate odors in the air stream from the wet cyclone (Horizon HT-68) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]
3. 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, maintain, and operate Uniqair's, 15kW, 15 plasma cylinders, cold plasma injection system to abate odors in the air stream from the dryer cyclone (MAC HE60) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
N-8234-4-2 : Mar 10 2015 1:58PM – KAHLONJ Joint Inspection NOT Required

4. 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, maintain, and operate Uniqair's, 9 kW, 9 plasma cylinders, cold plasma injection system to abate odors in the air stream from the dryer cooler cyclone (MAC) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

5. 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 285 WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201]

6. 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 conveyed to the totes in the basement. The surge bin shall be vented to a HORIZON SYSTEMS MODEL 21VFTC6 cartridge dust collector system. Each tote shall have a tight-fitting lid with a static sock filter. [District Rule 2201]

7. 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]

8. 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 14 finished product bins. Each bin shall be vented to a HORIZON SYSTEMS MODEL 21VFTC6 cartridge dust collector system. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to the totes in the basement. Each tote shall have a tight-fitting lid with a static sock filter. The owner or operator shall install, maintain, and operate Uniqair's, 3 kW, 3 plasma cylinders, cold plasma injection system to abate odors in the air stream from the vertical cooler cyclone (MAC HE52) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

9. Each reactor of the plasma injector system 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]

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

11. 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]

12. 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]

13. 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]

14. 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]

15. PM10 emissions from the operations covered under this permit shall not exceed 0.0612 pounds per ton of finished material produced. [District Rule 2201]

16. VOC emissions from the operations covered under this permit shall not exceed 0.047 pounds per ton of finished material produced. [District Rule 2201]

17. Total NOx emissions from the operations covered under this permit shall not exceed 0.471 pounds per hour. [District Rules 2201 and 4102]

18. Total VOC emissions from the operations covered under this permit shall not exceed 1.529 pounds per hour. [District Rule 4102]

19. No more than 36 tons of ground meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201]

20. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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]

22. The dryer shall only be fired on PUC-quality natural gas. [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. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

25. 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]

26. 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]

27. 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]

28. 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 plasma injection system shall be conducted at least once every 24 months. [District Rule 4309]

29. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]

30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]

31. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]

32. 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]

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

34. A sellable pet food product, containing at least 3% (by weight) of ground meat, shall be produced during VOC source testing and odor control efficiency testing. [District Rules 2201 and 4102]

35. The District may, at its discretion, require VOC source testing and odor panel testing at any time should conditions at the facility or the surrounding area warrant such testing. [District Rules 2201 and 4201]

36. The amount of ground meat injected into the steam-conditioner, finished product produced, and all other applicable parameters (exhaust flow rate, temperature, pressure, etc.), shall be recorded during VOC source testing and odor panel testing. [District Rules 2201 and 4102]

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

38. The permittee shall monitor and record the stack concentration of NOx and O2 downstream of each plasma injection system,within 60 days of startup under this permit, using a portable emission monitor that meets District specifications. The results shall be converted into hourly NOx emissions (lb/hour) using exhaust flow rate (dscfm) from the latest source test report, where exhaust flow rates were estimated. [District Rule 2201]

39. Total NOx emissions (lb/hour) shall include NOx emissions from the following release points by taking portable analyzer measurements according to the manufacturer recommended procedures, or by conducting a District-approved source test, downstream of the cold plasma injection system serving: (1) Hot kibble conveying cyclone (HT-68), (2) dryer cyclone (MAC HE60), (3) dryer cooler cyclone (MAC), and (4) vertical cooler cyclone (MAC HE-52). [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

40. The permittee shall maintain records of: (1) date and time of NOx and O2 measurements, (2) identification of the stack (e.g., hot kibble conveying cyclone (HT-68), dryer cyclone (MAC HE60), etc.) (3) O2 concentration in percent and the measured NOx concentrations, (4) exhaust flow rate (dscfm) in the latest NOx and CO source testing report, (5) NOx emissions (lb/hour), (6) total NOx emissions (lb/hour) from the operations covered under this permit unit, (7) make and model of exhaust gas analyzer, and (8) exhaust gas analyzer calibration records. [District Rule 2201]

41. 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]

42. 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 plasma injection system), 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]

43. 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]

44. 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]

45. The owner or operator shall continuously monitor and record the following parameters for each cold plasma injection system: (1) date, (2) pressure drop across pre-filter (DP3), (3) pressure drop across high efficiency filter (DP2), (4) pressure drop across cold plasma reactor (DP1), (5) plasma air velocity (AV1) after the cold plasma reactor, and (6) variable frequency drive (VFD) signal (ON/OFF). The set point for each parameter shall be as follows: DP3 < 400 Pa, DP2 < 400 Pa, DP1 <4,000 Pa, AV1 > 2 m/sec, and VFD signal in ON status. These parameters shall be recorded at least once every 15-minutes. The recorded parameters (except for VFD signal) shall be averaged over 60-minute blocks and compared with the established acceptable set points. Upon detecting any excursion, the owner or operator shall investigate the excursion and take corrective action to minimize odorous emissions and prevent recurrence of the excursion as expeditiously as practical, but no longer than 1 hour of operation after detection. If the monitoring equipment continues to show non-conformity with the established parameter(s) after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a thorough inspection, and repair of the cold plasma injection system within 24 hours of the first exceedance. In lieu of conducting a thorough inspection and repair of the cold plasma injection system, the owner or operator may stipulate a violation that is subject to enforcement action has occurred. The owner or operator must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the excursions are the result of a qualifying breakdown condition pursuant to Rule 1100, the owner or operator may fully comply with Rule 1100 in lieu of performing the notification required by this condition. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

46. The owner or operator shall maintain records of the date, the ground meat injection rate, excluding moisture, into the steam conditioner (tons/day), amount of finished product produced by this line (tons/day), and the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, 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). [District Rule 2201]

47. The owner or operator shall maintain all records of maintenance for cold plasma injector systems including any cold plasma reactor replacements. [District Rule 4102]

48. 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

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: N-8234-5-2 **ISSUANCE DATE:** 03/10/2015

LEGAL OWNER OR OPERATOR: DIAMOND PET FOOD PROCESSORS OF RIPON
MAILING ADDRESS: 942 SOUTH STOCKTON AVENUE
RIPON, CA 95366

LOCATION: 942 SOUTH STOCKTON AVENUE
RIPON, CA 95366

EQUIPMENT DESCRIPTION:
MODIFICATION OF: PET FOOD PROCESSING LINE #2: TO ESTABLISH A COMBINED NOX EMISSION LIMIT OF 0.471 LB/HR AND RE-ESTABLISH VOC EMISSION FACTOR TO 0.047 LB/TON OF FINISHED PRODUCT

CONDITIONS

1. This Authority to Construct (ATC) permit cancels and replaces the ATC N-8234-5-1. [District Rule 2201]
2. 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 with a static sock filter. The owner or operator shall install, maintain, and operate Uniqair's, 6kW, 6 plasma cylinders, cold plasma injection system to abate odors in the air stream from the wet cyclone (Horizon HT-68) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]
3. 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, maintain, and operate Uniqair's, 15kW, 15 plasma cylinders, cold plasma injection system to abate odors in the air stream from the dryer cyclone (MAC HE60) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
N-8234-5-2 : Mar 10 2015 1:56PM – KAHLONJ : Joint Inspection NOT Required

4. 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, maintain, and operate Uniqair's, 9 kW, 9 plasma cylinders, cold plasma injection system to abate odors in the air stream from the dryer cooler cyclone (MAC) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

5. 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 285 WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201]

6. 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 conveyed to the totes in the basement. The surge bin shall be vented to a HORIZON SYSTEMS MODEL 21VFTC6 cartridge dust collector system. Each tote shall have a tight-fitting lid with a static sock filter. [District Rule 2201]

7. 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]

8. 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 14 finished product bins. Each bin shall be vented to a HORIZON SYSTEMS MODEL 21VFTC6 cartridge dust collector system. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to the totes in the basement. Each tote shall have a tight-fitting lid with a static sock filter. The owner or operator shall install, maintain, and operate Uniqair's, 3 kW, 3 plasma cylinders, cold plasma injection system to abate odors in the air stream from the vertical cooler cyclone (MAC HE52) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

9. Each reactor of the plasma injector system 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]

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

11. 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]

12. 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]

13. 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]

14. 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]

15. PM10 emissions from the operations covered under this permit shall not exceed 0.0612 pounds per ton of finished material produced. [District Rule 2201]

16. VOC emissions from the operations covered under this permit shall not exceed 0.047 pounds per ton of finished material produced. [District Rule 2201]

17. Total NOx emissions from the operations covered under this permit shall not exceed 0.471 pounds per hour. [District Rules 2201 and 4102]

18. Total VOC emissions from the operations covered under this permit shall not exceed 1.529 pounds per hour. [District Rule 4102]

19. No more than 36 tons of ground meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201]

20. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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]

22. The dryer shall only be fired on PUC-quality natural gas. [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. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

25. 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]

26. 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]

27. 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]

28. 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 plasma injection system shall be conducted at least once every 24 months. [District Rule 4309]

29. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]

30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]

31. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]

32. 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]

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

34. A sellable pet food product, containing at least 3% (by weight) of ground meat, shall be produced during VOC source testing and odor control efficiency testing. [District Rules 2201 and 4102]

35. The District may, at its discretion, require VOC source testing and odor panel testing at any time should conditions at the facility or the surrounding area warrant such testing. [District Rules 2201 and 4201]

36. The amount of ground meat injected into the steam-conditioner, finished product produced, and all other applicable parameters (exhaust flow rate, temperature, pressure, etc.), shall be recorded during VOC source testing and odor panel testing. [District Rules 2201 and 4102]

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

38. The permittee shall monitor and record the stack concentration of NOx and O2 downstream of each plasma injection system, within 60 days of startup under this permit, using a portable emission monitor that meets District specifications. The results shall be converted into hourly NOx emissions (lb/hour) using exhaust flow rate (dscfm) from the latest source test report, where exhaust flow rates were estimated. [District Rule 2201]

39. Total NOx emissions (lb/hour) shall include NOx emissions from the following release points by taking portable analyzer measurements according to the manufacturer recommended procedures, or by conducting a District-approved source test, downstream of the cold plasma injection system serving: (1) Hot kibble conveying cyclone (HT-68), (2) dryer cyclone (MAC HE60), (3) dryer cooler cyclone (MAC), and (4) vertical cooler cyclone (MAC HE-52). [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

40. The permittee shall maintain records of: (1) date and time of NOx and O2 measurements, (2) identification of the stack (e.g., hot kibble conveying cyclone (HT-68), dryer cyclone (MAC HE60), etc.) (3) O2 concentration in percent and the measured NOx concentrations, (4) exhaust flow rate (dscfm) in the latest NOx and CO source testing report, (5) NOx emissions (lb/hour), (6) total NOx emissions (lb/hour) from the operations covered under this permit unit, (7) make and model of exhaust gas analyzer, and (8) exhaust gas analyzer calibration records. [District Rule 2201]

41. 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]

42. 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 plasma injection system), 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]

43. 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]

44. 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]

45. The owner or operator shall continuously monitor and record the following parameters for each cold plasma injection system: (1) date, (2) pressure drop across pre-filter (DP3), (3) pressure drop across high efficiency filter (DP2), (4) pressure drop across cold plasma reactor (DP1), (5) plasma air velocity (AV1) after the cold plasma reactor, and (6) variable frequency drive (VFD) signal (ON/OFF). The set point for each parameter shall be as follows: DP3 < 400 Pa, DP2 < 400 Pa, DP1 <4,000 Pa, AV1 > 2 m/sec, and VFD signal in ON status. These parameters shall be recorded at least once every 15-minutes. The recorded parameters (except for VFD signal) shall be averaged over 60-minute blocks and compared with the established acceptable set points. Upon detecting any excursion, the owner or operator shall investigate the excursion and take corrective action to minimize odorous emissions and prevent recurrence of the excursion as expeditiously as practical, but no longer than 1 hour of operation after detection. If the monitoring equipment continues to show non-conformity with the established parameter(s) after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a thorough inspection, and repair of the cold plasma injection system within 24 hours of the first exceedance. In lieu of conducting a thorough inspection and repair of the cold plasma injection system, the owner or operator may stipulate a violation that is subject to enforcement action has occurred. The owner or operator must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the excursions are the result of a qualifying breakdown condition pursuant to Rule 1100, the owner or operator may fully comply with Rule 1100 in lieu of performing the notification required by this condition. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

46. The owner or operator shall maintain records of the date, the ground meat injection rate, excluding moisture, into the steam conditioner (tons/day), amount of finished product produced by this line (tons/day), and the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, 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). [District Rule 2201]

47. The owner or operator shall maintain all records of maintenance for cold plasma injector systems including any cold plasma reactor replacements. [District Rule 4102]

48. 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

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: N-8234-6-2 **ISSUANCE DATE:** 03/10/2015

LEGAL OWNER OR OPERATOR: DIAMOND PET FOOD PROCESSORS OF RIPON
MAILING ADDRESS: 942 SOUTH STOCKTON AVENUE
RIPON, CA 95366

LOCATION: 942 SOUTH STOCKTON AVENUE
RIPON, CA 95366

EQUIPMENT DESCRIPTION:
MODIFICATION OF: PET FOOD PROCESSING LINE #3: TO ESTABLISH A COMBINED NOX EMISSION LIMIT OF 0.471 LB/HR AND RE-ESTABLISH VOC EMISSION FACTOR TO 0.047 LB/TON OF FINISHED PRODUCT

CONDITIONS

1. This Authority to Construct (ATC) permit cancels and replaces the ATC N-8234-6-1. [District Rule 2201]
2. 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 with a static sock filter. The owner or operator shall install, maintain, and operate Uniqair's, 6kW, 6 plasma cylinders, cold plasma injection system to abate odors in the air stream from the wet cyclone (Horizon HT-68) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]
3. 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, maintain, and operate Uniqair's, 15kW, 15 plasma cylinders, cold plasma injection system to abate odors in the air stream from the dryer cyclone (MAC HE60) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
N-8234-6-2 : Mar 10 2015 1:58PM – KAHLCAU : Joint Inspection NOT Required

4. 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, maintain, and operate Uniqair's, 9 kW, 9 plasma cylinders, cold plasma injection system to abate odors in the air stream from the dryer cooler cyclone (MAC) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

5. 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 285 WRDL8 baghouse. This baghouse is vented indoors. [District Rule 2201]

6. 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 conveyed to the totes in the basement. The surge bin shall be vented to a HORIZON SYSTEMS MODEL 21VFTC6 cartridge dust collector system. Each tote shall have a tight-fitting lid with a static sock filter. [District Rule 2201]

7. 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]

8. 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 14 finished product bins. Each bin shall be vented to a HORIZON SYSTEMS MODEL 21VFTC6 cartridge dust collector system. The fines (rejects) from MAC HE52 cyclone discharge and vibratory pan are conveyed to the totes in the basement. Each tote shall have a tight-fitting lid with a static sock filter. The owner or operator shall install, maintain, and operate Uniqair's, 3 kW, 3 plasma cylinders, cold plasma injection system to abate odors in the air stream from the vertical cooler cyclone (MAC HE52) prior to its discharge into the atmosphere. [District Rules 2201 and 4102]

9. Each reactor of the plasma injector system 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]

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

11. 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]

12. 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]

13. 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]

14. 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]

15. PM10 emissions from the operations covered under this permit shall not exceed 0.0612 pounds per ton of finished material produced. [District Rule 2201]

16. VOC emissions from the operations covered under this permit shall not exceed 0.047 pounds per ton of finished material produced. [District Rule 2201]

17. Total NOx emissions from the operations covered under this permit shall not exceed 0.471 pounds per hour. [District Rules 2201 and 4102]

18. Total VOC emissions from the operations covered under this permit shall not exceed 1.529 pounds per hour. [District Rule 4102]

19. No more than 36 tons of ground meat, excluding moisture, shall be injected into the steam-conditioner in any one day. [District Rule 2201]

20. The amount of finished product produced under this line shall not exceed 780 tons in any one day. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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]

22. The dryer shall only be fired on PUC-quality natural gas. [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. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

25. 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]

26. 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]

27. 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]

28. 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 plasma injection system shall be conducted at least once every 24 months. [District Rule 4309]

29. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]

30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]

31. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]

32. 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]

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

34. A sellable pet food product, containing at least 3% (by weight) of ground meat, shall be produced during VOC source testing and odor control efficiency testing. [District Rules 2201 and 4102]

35. The District may, at its discretion, require VOC source testing and odor panel testing at any time should conditions at the facility or the surrounding area warrant such testing. [District Rules 2201 and 4201]

36. The amount of ground meat injected into the steam-conditioner, finished product produced, and all other applicable parameters (exhaust flow rate, temperature, pressure, etc.), shall be recorded during VOC source testing and odor panel testing. [District Rules 2201 and 4102]

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

38. The permittee shall monitor and record the stack concentration of NOx and O2 downstream of each plasma injection system,within 60 days of startup under this permit, using a portable emission monitor that meets District specifications. The results shall be converted into hourly NOx emissions (lb/hour) using exhaust flow rate (dscfm) from the latest source test report, where exhaust flow rates were estimated. [District Rule 2201]

39. Total NOx emissions (lb/hour) shall include NOx emissions from the following release points by taking portable analyzer measurements according to the manufacturer recommended procedures, or by conducting a District-approved source test, downstream of the cold plasma injection system serving: (1) Hot kibble conveying cyclone (HT-68), (2) dryer cyclone (MAC HE60), (3) dryer cooler cyclone (MAC), and (4) vertical cooler cyclone (MAC HE-52). [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

40. The permittee shall maintain records of: (1) date and time of NOx and O2 measurements, (2) identification of the stack (e.g., hot kibble conveying cyclone (HT-68), dryer cyclone (MAC HE60), etc.) (3) O2 concentration in percent and the measured NOx concentrations, (4) exhaust flow rate (dscfm) in the latest NOx and CO source testing report, (5) NOx emissions (lb/hour), (6) total NOx emissions (lb/hour) from the operations covered under this permit unit, (7) make and model of exhaust gas analyzer, and (8) exhaust gas analyzer calibration records. [District Rule 2201]

41. All alternate monitoring parameter emission readings shall he 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]

42. 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 plasma injection system), 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]

43. 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]

44. 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]

45. The owner or operator shall continuously monitor and record the following parameters for each cold plasma injection system: (1) date, (2) pressure drop across pre-filter (DP3), (3) pressure drop across high efficiency filter (DP2), (4) pressure drop across cold plasma reactor (DP1), (5) plasma air velocity (AV1) after the cold plasma reactor, and (6) variable frequency drive (VFD) signal (ON/OFF). The set point for each parameter shall be as follows: DP3 < 400 Pa, DP2 < 400 Pa, DP1 <4,000 Pa, AV1 > 2 m/sec, and VFD signal in ON status. These parameters shall be recorded at least once every 15-minutes. The recorded parameters (except for VFD signal) shall be averaged over 60-minute blocks and compared with the established acceptable set points. Upon detecting any excursion, the owner or operator shall investigate the excursion and take corrective action to minimize odorous emissions and prevent recurrence of the excursion as expeditiously as practical, but no longer than 1 hour of operation after detection. If the monitoring equipment continues to show non-conformity with the established parameter(s) after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a thorough inspection, and repair of the cold plasma injection system within 24 hours of the first exceedance. In lieu of conducting a thorough inspection and repair of the cold plasma injection system, the owner or operator may stipulate a violation that is subject to enforcement action has occurred. The owner or operator must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the excursions are the result of a qualifying breakdown condition pursuant to Rule 1100, the owner or operator may fully comply with Rule 1100 in lieu of performing the notification required by this condition. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

46. The owner or operator shall maintain records of the date, the ground meat injection rate, excluding moisture, into the steam conditioner (tons/day), amount of finished product produced by this line (tons/day), and the combined amount of finished product produced by all pet food manufacturing lines (N-8234-4, '-5 and '-6, 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). [District Rule 2201]

47. The owner or operator shall maintain all records of maintenance for cold plasma injector systems including any cold plasma reactor replacements. [District Rule 4102]

48. 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]