July 7, 2023

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

Re: Notice of Final Action - Title V Permit
Facility Number: N-8234
Project Number: N-1213836

Dear Mr. Clark:

The District has issued the Final Title V Permit for Diamond Pet Foods - Ripon. The preliminary decision for this project was made on May 10, 2023. No comments were received subsequent to the District preliminary decision.

The public notice for issuance of the Final Title V Permit will be posted on the District’s website (www.valleyair.org).

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
Gerardo Rios, EPA (w/enclosure) via EPS
Mark Rasmussen, Compliance Manager
Permit to Operate

FACILITY: N-8234

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
San Joaquin Valley
Air Pollution Control District

FACILITY: N-8234-0-0
EXPIRATION DATE: 04/30/2028

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. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit

4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit

5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit

6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit

8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: DIAMOND PET FOODS - RIPON
Location: 942 S STOCKTON AVE, RIPON, CA 95366

N-8234-0-0 7/10/2023 10:48 AM - KAHOOF
10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit

12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit

13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit

14. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit

15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit

16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit

17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit

18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit

19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit

21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
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. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit

29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit

30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit

31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit

32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit

33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit

34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit

35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
Facility-wide Requirements for N-8234-0-0 (continued)

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

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

42. The issuance date of the Initial Title V Permit is July 31, 2023. The reporting periods for the Report of Required Monitoring and the Annual Compliance Certification begin July 1 of each year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of the end of the reporting period. [District Rule 2520]
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT REQUIREMENTS

Facility Name: DIAMOND PET FOODS - RIPON
Location: 942 S STOCKTON AVE, RIPON, CA 95366

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-2-7  EXPIRATION DATE: 04/30/2028

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 conveyors 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 conveyors 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

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

Facility Name: DIAMOND PET FOODS - RIPON
Location: 942 S STOCKTON AVE, RIPON, CA 95366
N-8234-3-5; Jul 7 2023 10:48AM - KAHLONU

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

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

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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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
46. The process VOC emissions shall be calculated as follows: \( \text{VOC (lb/hr)} = \text{VOC_{inlet} of the RTO (lb/hr)} - \text{VOC_{outlet} of the RTO (lb/hr)} \). \( \text{VOC_{outlet} of the RTO (lb/hr)} = \text{VOC_{measured at the outlet of RTO (lb/hr)} - VOC_{natural gas combustion in the RTO (lb/hr)}. \) 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

These terms and conditions are part of the Facility-wide Permit to Operate.
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 occurring 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 occurring 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
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
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
46. The process VOC emissions shall be calculated as follows: VOC (lb/hr) = VOC_inlet of the RTO (lb/hr) - VOC_outlet of the RTO (lb/hr). VOC_outlet of the RTO (lb/hr) = VOC_measured at the outlet of RTO (lb/hr) - VOC_natural 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 Rule 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
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
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

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
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 occurring 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 combustion chamber temperature. The combustion temperature shall be continuously monitored and recorded at least every 15-minutes whenever odor abatement is occurring 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
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
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
46. The process VOC emissions shall be calculated as follows: \[ \text{VOC (lb/hr)} = \text{VOC}_{\text{inlet of the RTO (lb/hr)}} - \text{VOC}_{\text{outlet of the RTO (lb/hr)}} \]. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

These terms and conditions are part of the Facility-wide Permit to Operate.
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-8234-9-4
EXPIRATION DATE: 04/30/2028

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] 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.

These terms and conditions are part of the Facility-wide Permit to Operate.
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/MBBtu) 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, 4301, 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

These terms and conditions are part of the Facility-wide Permit to Operate.
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
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. 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]
San Joaquin Valley
Air Pollution Control District

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

PERMIT UNIT: N-8234-12-1
EXPIRATION DATE: 04/30/2028

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

1. The engine shall be equipped with a turbocharger and with an aftercooler. [District NSR Rule] 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. 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
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

These terms and conditions are part of the Facility-wide Permit to Operate.
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
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-8234-19-1
EXPIRATION DATE: 04/30/2028

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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