



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718

Emission Reduction Credit Certificate
N-212-4

ISSUED TO: POHL ALMOND HULLING
 ISSUED DATE: October 29, 2008
 LOCATION OF REDUCTION: 1825 VERDUGA ROAD
 SECTION: 7 TOWNSHIP: 045 RANGE: 11E

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	4,279 lbs	8,511 lbs

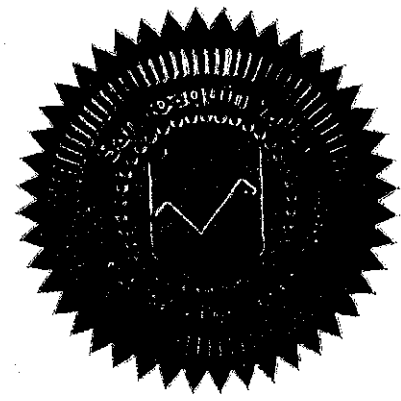
Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Replacement of the existing cyclone serving the almond precleaner with a baghouse and use of the baghouse to control emissions from the almond receiving pit.

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.



Seyed Sadredin, Executive Director / APCO

David Warner
David Warner, Director of Permit Services



San Joaquin Valley
Air Pollution Control District

Fax Transmittal

4800 Enterprise Way
Modesto, California 95356-8718
Phone (209) 557-6400
Fax (209) 557-6475

Date : September 22, 2008

To : Lynn Sargenti

Fax Number : PSD - Central

From : Kai Chan

Number of pages (includes cover sheet): 17

Description : Copy of all appendices for ERC Banking Project #N-1000590, N-2110.

- | | |
|---|--|
| <input type="checkbox"/> Per Your Request | <input checked="" type="checkbox"/> For Your Information |
| <input type="checkbox"/> Per Our Conversation | <input type="checkbox"/> For Your Approval |
| <input checked="" type="checkbox"/> Take Appropriate Action | <input type="checkbox"/> Review & Comment |
| <input type="checkbox"/> Please Answer | <input type="checkbox"/> Review & Return |
- Original transmittal will follow via mail

Remarks / Response :

COPY



San Joaquin Valley
Air Pollution Control District

December 27, 2000

Bryan Holmes
Pohl Almond Hulling
1825 Verduga Road
Hughson, CA 95326

**Re: Notice of Receipt of Complete Application - Emission Reduction Credits
Project Number: 1000509**

Dear Mr. Holmes:

The District has completed a preliminary review of your application for Emission Reduction Credits (ERCs) resulting from the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA.

Based on this preliminary review, the application appears to be complete. However, during processing of your application, the District may request additional information to clarify, correct, or otherwise supplement, the information on file.

Pursuant to District Rule 3010, section 3.0, your application may be subject to an hourly Engineering Evaluation Fee. If the applicable fees exceed the submitted application filing fee, the District will notify you at the conclusion of our review.

Thank you for your cooperation. Should you have any questions, please contact Mr. Rupl Gill at (209) 557-6400.

Sincerely,

Seyed Sadredin
Director of Permit Services


for
James Swaney
Permit Services Manager

KC

David L. Crow
Executive Director/Air Pollution Control Officer

Northern Region Office
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9322
(209) 557-6400 ♦ FAX (209) 557-6475

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

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2370
(661) 326-6900 ♦ FAX (661) 326-6985



San Joaquin Valley Air Pollution Control District

Fax Transmittal

1990 E. Gettysburg Avenue
Fresno, California 93726-0244
Phone (559) 230-6000
Fax (559) 230-6061

RECEIVED

JEC 27 2000

SAN JOAQUIN VALLEY
UNIFIED A.P.C.D.
NO. REGION

Date : December 27, 2000

To : Kai Chan

Fax Number : 6475

From : Elizabeth Assefa

Number of pages (including cover sheet): 3

Description :

- | | |
|--|---|
| <input checked="" type="checkbox"/> Per Your Request | <input type="checkbox"/> For Your Information |
| <input checked="" type="checkbox"/> Per Our Conversation | <input type="checkbox"/> For Your Approval |
| <input type="checkbox"/> Take Appropriate Action | <input type="checkbox"/> Review & Comment |
| <input type="checkbox"/> Please Answer | <input type="checkbox"/> Review & Return |
| <input type="checkbox"/> Original transmittal will follow via mail | |

Remarks / Response :

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROLL DISTRICT

MEMORANDUM

Date: February 7, 2000
 To: File C-619, Harris Woolf Calif Almonds
 From: Robert Vinson
 Subject: Source Testing
 CC: Lance Leitch

RECEIVED

DEC 27 2000

SAN JOAQUIN VALLEY
UNIFIED A.P.C.D.
NO. REGION

On October 27 & 28 and November 7, 1999, Harris Woolf conducted a start-up source test with regard to ATCs C-619-5-0 and -6-0. The source test was conducted by AIRx Testing.

A review of the source tests revealed that the particulate limits set in both ATCs were exceeded. Notices of Violation #007242 and #007243 were issued to the facility.

ATC C-619-5-0 Receiving and Pre-cleaning operation

Limit	.0155 lb/ton
Results	.056 lb/ton

ATC C-619-6-0 Hulling/ Shelling Operation

Limit	.0574 lb/ton
Results	.165 lb/ton

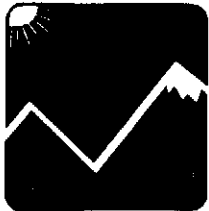
**HARRIS WOOLF CALIFORNIA ALMONDS
EMISSION SUMMARY 10/27/99-11/4/99**

PRECLEANING SYSTEM

SAUNCO UNIT	Run #1	Run #2	Run #3	Average
Total Particulate				
gr/dscf	0.0023	0.0019	0.0060	0.0034
lb/hr	0.60	0.51	1.52	0.88
lb/ton	0.018	0.015	0.046	0.026
Average Field Weight				
ton/hr				33.25
MAC UNIT				
Total Particulate				
gr/dscf	0.0055	0.0049	0.0037	0.0047
lb/hr	1.06	0.91	0.70	0.89
lb/ton	0.036	0.031	0.024	0.030
Average Field Weight				
ton/hr				29.62
Total System Particulate Emissions				
gr/dscf				0.0081
lb/hr				1.77
lb/ton				0.056

SHELLER SYSTEM

SAUNCO	Run #1	Run #2	Run #3	Average
Total Particulate				
gr/dscf	0.0026	0.0031	0.0024	0.0027
lb/hr	0.88	1.06	0.84	0.93
lb/ton	0.069	0.083	0.066	0.073
Average Field Weight				
ton/hr				12.74
MAC				
Total Particulate				
gr/dscf	0.0035	0.0041	0.0030	0.0035
lb/hr	1.82	2.12	1.60	1.85
lb/ton	0.090	0.105	0.080	0.092
Average Field Weight				
lb/hr				20.11
Total System Particulate Emissions				
gr/dscf				0.0062
lb/hr				2.77
lb/ton				0.165



San Joaquin Valley
Air Pollution Control District

COPY

October 26, 2000

Bryan Holmes
Pohl Almond Hulling
1825 Verduga Road
Hughson, CA 95326

Re: Notice of Receipt of Incomplete Application - Emission Reduction Credits

Project Number: 1000509

ERC Application Number: N-212-4

Dear Mr. Holmes:

The District has reviewed the additional information received regarding your application for Emission Reduction Credits (ERCs) resulting from use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA.

Your application remains incomplete and the following information is required prior to further processing:

1. The modified almond receiving and precleaning operation (Permit N-2110-1-1) served by a baghouse will be required to be source tested to verify that the emission concentration limits that will be utilized to calculate the quantity of emission reduction credits are valid. This requirement may be satisfied by proposing to utilize one of the following methods:

Method 1:

To have the ERCs issued after performing the required source test, then perform and submit the results of the source test on the modified almond receiving and precleaning operation to demonstrate compliance with the PM₁₀ emission limitations on District permit N-2110-1-1. Please note, source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. Source testing to measure PM₁₀ shall be conducted using either: (a). EPA Method 201 or 201A and 202; or (b). CARB Method 5 in combination with 501.

David L. Crow
Executive Director/Air Pollution Control Officer

October 26, 2000
Bryan Holmes
Page 2

Method 2:

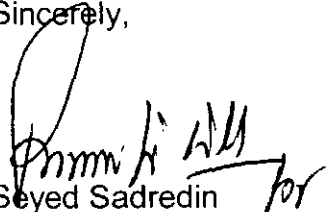
To have the ERCs issued before performing the required source test, then submit an Authority to Construct (ATC) application to modify permit N-2110-1-1 to add a condition to source test the baghouse serving the almond receiving & precleaning operation (Permit N-2110-1-1). The ATC application forms are enclosed.

In response, please refer to the above project number, and send to the attention of Mr. Kai Chan.

Please submit the requested information within 90 days. The District will not be able to process your application until this information is received. Please note that the District's Small Business Assistance (SBA) office is available to assist you in this matter. You may contact an SBA engineer at (209) 557-6446.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Kai Chan of Permit Services at (209) 557-6451.

Sincerely,


Seyed Sadredin
Director of Permit Services

Enclosure

KC

CC: SBA

Pohl & Holmes

Hulling • Shelling

1825 Verduga Rd. • Hughson, CA 95326 • (209) 883-4853

RECEIVED
OCT 10 2000

SAN JOAQUIN VALLEY
UNIFIED A.P.C.D.
NO. REGION

October 7, 2000

Mr. Kai Chan
San Joaquin Valley
Air Pollution Control District
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9321

Project Number: 1000509
ERC Application Numbers:
N-212-4

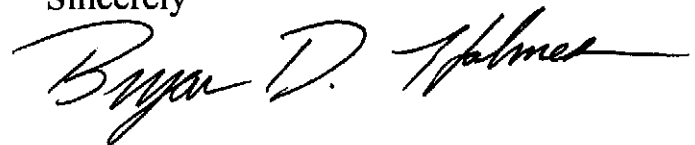
Dear Mr. Chan

In response to your letter regarding questions on the application for Emission Reduction Credits, here is the information you requested:

- 1) The date the almond receiving and precleaning operation was first operated was August 23, 2000.
- 2) The maximum daily processing prior to the new equipment was 320 tons/day.
- 3) Total tons of almonds received and precleaned from April 1998 to the end of March 2000.

	1 st	2 nd	3 rd	4 th
1998			3,993.18	7,986.37
1999			7,084.89	14,049.78

Sincerely



Bryan Holmes
Co-Owner



San Joaquin Valley
Air Pollution Control District

COPY

July 11, 2000

Martin Pohl
Pohl Almond Hulling
1825 Verduga Road
Hughson, CA 95326

Re: Notice of Receipt of Incomplete Application - Emission Reduction Credits
Project Number: 1000509
ERC Application Numbers: N-212-4

Dear Mr. Pohl:

The District has completed a preliminary review of your application for Emission Reduction Credits (ERCs) resulting from the replacement of the cyclone serving the almond receiving and precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA.

Based on this preliminary review, the application has been determined to be incomplete. The following information is required prior to further processing:

1. Indicate the date the almond receiving and precleaning operation was first operated at normal operating conditions after the cyclone was replaced with the new baghouse.
2. Indicate the maximum daily processing rate (in field weight tons/day) of the almond receiving and precleaning equipment prior to the proposed replacement of the existing cyclones with a baghouse.
3. Provide logs of the total quantity of almonds received and precleaned (in field weight tons/quarter) for each calendar quarter from April 1998 to the end of March 2000.

In response, please refer to the above project number, and send to the attention of Mr. Kai Chan.

David L. Crow
Executive Director/Air Pollution Control Officer

Northern Region Office
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9321
(209) 557-6400 • FAX (209) 557-6475

Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 • FAX (559) 230-6061

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2370
(661) 326-6900 • FAX (661) 326-6985

July 11, 2000
Martin Pohl
Page 2

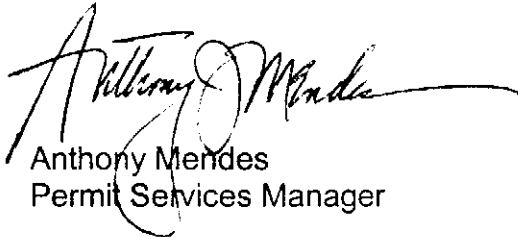
Please submit the requested information within 90 days. The District will not be able to process your application until this information is received. Please note that the District's Small Business Assistance (SBA) office is available to assist you in this matter. You may contact an SBA engineer at (209) 557-6446.

Please note the proposed modified almond receiving and precleaning operation served by a baghouse will be required to be source tested to validate the emission reduction credits.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Kai Chan of Permit Services at (209) 557-6451.

Sincerely,

Seyed Sadredin
Director of Permit Services



Anthony Mendes
Permit Services Manager

Attachments

KC

CC: SBA

NORTHERN REGION

CENTRAL REGION

SOUTHERN REGION

ERC/PUBLIC NOTICE CHECK LIST

PROJECT #s: N-1000509

√ √
REQST. COMPL.

— — ERC TRANSFER OF PREVIOUSLY BANKED CREDITS
— — ERC PRELIMINARY PUBLIC NOTICE
√ — ERC FINAL PUBLIC NOTICE
— — NSR/CEQA PRELIMINARY PUBLIC NOTICE
— — NSR/CEQA FINAL PUBLIC NOTICE

RECEIVED

OCT 31 2008

SJVAPCD
NORTHERN REGION

Date Completed October 29, 2008 /By Rupi Gill

√ ✓ Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)

ENCLOSED DOCUMENTS REQUIRE:

√ ✓ Director's Signature and District Seal Embossed on ERC Certificates

√ ✓ Send **FINAL** notice letters to CARB and EPA including the following:
√ Public Notice
√ Copies of ERC Certificates

√ ✓ Send **FINAL** notice letter to applicant by **Certified Mail** including the following:
√ Public Notice
√ Original ERC Certificates

√ ✓ Send the following to regional engineer, Kai Chan:
√ Copies of All **FINAL** Notice Letters
√ Public Notice
√ Copies of ERC Certificates

√ ✓ Send **FINAL** Public Notice for Publication to Modesto Bee

√ ✓ Assign Mailing Date

√ ✓ Other Special Instructions (please specify): Send processing fees invoice (Invoice #71403) to applicant along with final notice letter & ERC certificate.



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

OCT 29 2008

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

**RE: Notice of Final Action - Emission Reduction Credits
Project Number: N-1000509**

Dear Mr. Tollstrup:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Pohl Almond Hulling for emission reductions generated by the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs to be issued is 12,790 pounds of PM10 per calendar year.

Enclosed are copies of the ERC Certificates and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ERC Certificates was published on September 29, 2008. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on September 23, 2008. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

David Warner
Director of Permit Services

DW:KC/ry

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

Southern Region
2700 M Street, Suite 275
Bakersfield, CA 93301-2373
Tel: (661) 326-6900 FAX: (661) 326-6985



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

OCT 29 2008

Gerardo C. Rios (AIR 3)
Chief, Permits Office
Air Division
U.S. E.P.A. - Region IX
75 Hawthorne Street
San Francisco, CA 94105

RE: Notice of Final Action - Emission Reduction Credits
Project Number: N-1000509

Dear Mr. Rios:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Pohl Almond Hulling for emission reductions generated by the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs to be issued is 12,790 pounds of PM10 per calendar year.

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

Sincerely,

David Warner
Director of Permit Services

DW:KC/ry

Enclosures

Sayed Sadredin
Executive Director/Air Pollution Control Officer

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Modesto, CA 95356-8718
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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

OCT 29 2008

Bryan Holmes
Pohl Almond Hulling
1825 Verduga Road
Hughson, CA 95326

RE: Notice of Final Action - Emission Reduction Credits
Project Number: N-1000509

Dear Mr. Holmes:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Pohl Almond Hulling for emission reductions generated by the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs to be issued is 12,790 pounds of PM10 per calendar year.

Enclosed are the ERC Certificates and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ERC Certificates was published on September 29, 2008. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on September 23, 2008. No comments were received following the District's preliminary decision on this project.

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

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

Sincerely,

David Warner
Director of Permit Services

DW:KC/ry

Enclosures

Sayed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718

Emission Reduction Credit Certificate
N-212-4

ISSUED TO: POHL ALMOND HULLING
 ISSUED DATE: October 29, 2008
 LOCATION OF REDUCTION: 1825 VERDUGA ROAD
 SECTION: 7 TOWNSHIP: 045 RANGE: 11E

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	4,279 lbs	8,511 lbs

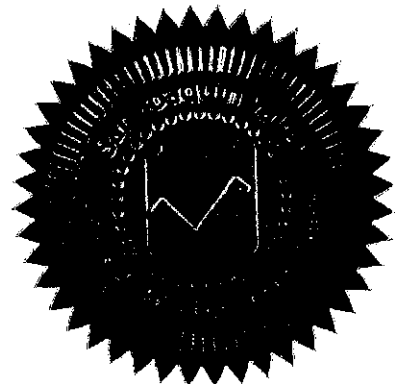
Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Replacement of the existing cyclone serving the almond precleaner with a baghouse and use of the baghouse to control emissions from the almond receiving pit.

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.



Seyed Sadredin, Executive Director / APCO

David Warner
David Warner, Director of Permit Services



San Joaquin Valley
Unified Air Pollution
Control District

Due Date
11/28/2008

Amount Due
\$ 0.00

Amount Enclosed

ERCFEE N1000509
2110 N71403 10/29/2008

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

POHL ALMOND HULLING
1825 VERDUGA RD
HUGHSON, CA 95326

SJVAPCD
4800 Enterprise Way
Modesto, CA 95356-8718

Thank You!



San Joaquin Valley
Unified Air Pollution
Control District

SJVAPCD Tax ID: 77-0262563

POHL ALMOND HULLING
1825 VERDUGA RD
HUGHSON, CA 95326

Facility ID
N2110

Invoice Date
10/29/2008

Invoice Number
N71403

Invoice Type
Project: N1000509

PROJECT NUMBER: 1000509

APPLICATION FILING FEES	\$ 650.00
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	(\$ 650.00)
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)	\$ 0.00

San Joaquin Valley Air Pollution Control District
4800 Enterprise Way, Modesto, CA 95356-8718, (209) 557-6400, Fax (209) 557-6475

Invoice Detail

Facility ID: N2110

POHL ALMOND HULLING
 1825 VERDUGA RD
 HUGHSON, CA 95326

Invoice Nbr: N71403
 Invoice Date: 10/29/2008
 Page: 1

Application Filing Fees

Project Nbr	Permit Number	Description	Application Fee
N1000509	N-2110-1000509-0	Emission Reduction Credit Banking Evaluation Fee	\$ 650.00
Total Application Filing Fees:			\$ 650.00

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
N1000509	7 hours	\$ 90.00 /h	Standard Engineering Time	\$ 630.00
			Less Credit For Application Filing Fees	(\$ 630.00)
			Standard Engineering Time SubTotal	\$ 0.00
Total Engineering Time Fees:				\$ 0.00

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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For delivery information visit our website at www.usps.com

OFFICIAL USE

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 7008 0150 0003 8533 0452

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To **Bryan Holmes**
 Pohl Almond Hulling
 Street, Apt. No., or PO Box No. **1825 Verduga Road**
 City, State, ZIP+4 **Hughson, CA 95326**

PS Form 3800, A

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Bryan Holmes
Pohl Almond Hulling
1825 Verduga Road
Hughson, CA 95326

2. Article Number (Transfer from) **7008 0150 0003 8533 0452**

COMPLETE THIS SECTION ON DELIVERY

A. Signature Addressee Agent
Ginger Whatty

B. Received by (Printed Name) **Ginger Whatty** Date of Delivery **10/20**

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

UNITED STATES POSTAL SERVICE

RECEIVED

OCT 31 2008

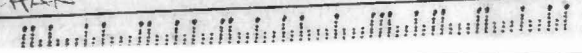
SJVAPCD
 NORTHERN REGION

• Sender: Please print your name, address, and ZIP+4 in this box •

San Joaquin Valley APCD
Northern Region Office
4800 Enterprise Way
Modesto, CA 95356

KAE CHAN

First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10



Modesto Bee
Modesto Bee

**NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Pohl Almond Hulling for emission reductions generated by the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs to be issued is 12,790 pounds of PM10 per calendar year.

No comments were received following the District's preliminary decision on this project.

The application review for Project #N-1000509 is available for public inspection at the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

Virtual Ad Taker

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Your confirmation number is L54322.1.

Lines: 30

Your Ad is scheduled to run on these date(s):

Modesto Bee: 11/03/2008

Classification: 8000 - Public Notices

NOTICE OF FINAL ACTION FOR THE ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Pahl Almond Hulling for emission reductions generated by the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs to be issued is 12,790 pounds of PM10 per calendar year.

No comments were received following the District's preliminary decision on this project.

The application review for Project #N-1000509 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356-8718.
Pub Dates November 3, 2008

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**PRELIMINARY REVIEW
SUPPLEMENT FOR AN ERC APPLICATION**

Date: October 26, 2000
To: File for Pohl Almond Hulling
From: Kai Chan

Subject: Project No.: 1000509
Facility ID No.: N-2110
ERC No.: N-212-4
Project Description: Emission reductions due to the replacement of the existing cyclones serving the receiving & precleaning operation with a baghouse.

EMISSIONS CALCULATIONS:

(A). Assumptions:

1. Particulate matter will only be emitted from the receiving pit and the baghouse serving the precleaning equipment.
2. Control efficiency for the proposed new baghouse will be 99% for PM₁₀.
3. The results of ARB's particle size testing at several almond hulling facilities titled "Report on Tests of Emissions from Almond Hullers in San Joaquin Valley, ARB, April 1975" will be used to determine the PM₁₀ fraction of the total particulate matter emitted from the unloading of almonds. The average PM₁₀ fraction is determined as:

$$\text{Average PM}_{10} \text{ Fraction} = 0.9 \text{ lbs. PM}_{10}/\text{lb PM}$$

(B). Emission Factors:

1. An emission factor for almond processing from AP-42, Table 9.10.2.1-1 (1/95) for the unloading operation (uncontrolled) will be utilized to calculate the PM₁₀ emission factors before and after the installation of the new baghouse. Therefore:

$$EF_{\text{PM/Unloading/Uncontrolled}} = 0.06 \text{ lbs. PM/fwt}$$

$$\begin{aligned} EF_{2/\text{Receiving}} &= EF_{\text{PM/Unloading/Uncontrolled}} \times \text{PM}_{10} \text{ Fraction} \\ &= 0.06 \text{ lbs. PM/fwt} \times 0.9 \text{ lbs. PM}_{10}/\text{lb. PM} \\ &= 0.054 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

$$\begin{aligned} EF_{1/\text{Receiving}} &= EF_{2/\text{Receiving}} \times (1 - \text{Baghouse Control Efficiency}) \\ &= 0.054 \text{ lbs. PM}_{10}/\text{fwt} \times (1 - 0.99) \\ &= 0.00054 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

2. An emission factor for almond processing from AP-42, Table 9.10.2.1-1 (1/95) for precleaning operation served by a baghouse will be utilized to calculate the PM₁₀ emissions before and after the replacement of the existing cyclone with the new baghouse.

$$\begin{aligned} EF_{2/\text{Precleaning}} &= EF_{\text{PM10/Precleaning Cyclone}} = 0.82 \text{ lbs. PM}_{10}/\text{fwt} \\ EF_{1/\text{Precleaning}} &= EF_{\text{PM10/Precleaning Baghouse}} = 0.015 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

(C). Calculations for Actual Emissions Reductions (AER):

The applicant is proposing to install a baghouse to serve the existing receiving pit and to replace the existing cyclone with a baghouse. The almond receiving and precleaning operation is a pre-baseline emission unit and its emissions do not contribute to the NSR balance (Ref. District Rule 2201, Section 6.6.2).

AERs due to the installation of a control device or due to the implementation of a more efficient process or material is calculated using the following equation from District Rule 2201, Section 6.5.3:

$$\text{AER} = \text{HAE} \times \Delta\text{CE}$$

where, HAE = Historical Actual Emissions
 ΔCE = Increase in Control Efficiency after the modification

$$\Delta\text{CE} = (\text{EF}_2 - \text{EF}_1) \div \text{EF}_2$$

where, EF₂ = Emission factor before the modification
 EF₁ = Emission factor after the modification

The baseline period for this emission unit will be the eight quarter period ending with the last complete quarter prior to the completed application for the ATC authorizing the installation of the baghouse. Specifically, the baseline period will be from April 1, 1998 through March 31, 2000.

Field Weight Tons (fwt) of Almonds Received & Precleaned				
Year	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
1998	---	0	3,993	7,983
1999	0	0	7,085	14,050
2000	0	---	---	---
Average	0	0	5,539	11,017

The HAE will be calculated by multiplying the average amount of almonds processed in each quarter during the baseline period, as provided by the applicant, by the pre-modification emission factor. Therefore:

$$\begin{aligned} \text{HAE}_{\text{PM10}} &= \text{Average Process Rate (fwt/qtr)} \times (\text{EF}_{2/\text{Receiving}} + \text{EF}_{2/\text{Precleaning}}) \\ &= \text{Average Process Rate (fwt/qtr)} \times (0.054 \text{ lbs PM}_{10}/\text{fwt} + 0.82 \text{ lbs PM}_{10}/\text{fwt}) \\ &= \text{Average Process Rate (fwt/qtr)} \times 0.874 \text{ lbs PM}_{10}/\text{fwt} \end{aligned}$$

$$AER_{PM_{10}} = HAE_{PM_{10}} \times \Delta CE$$

$$\begin{aligned} \Delta CE &= [(EF_{2/Receiving} + EF_{2/Precleaning}) - (EF_{1/Receiving} + EF_{1/Precleaning})] \div (EF_{2/Receiving} + EF_{2/Precleaning}) \\ &= [(0.054 \text{ lbs PM}_{10}/\text{ton} + 0.82 \text{ lbs PM}_{10}/\text{ton}) - (0.00054 \text{ lbs PM}_{10}/\text{ton} + 0.015 \text{ lbs PM}_{10}/\text{ton})] \\ &\quad \div (0.054 \text{ lbs PM}_{10}/\text{ton} + 0.82 \text{ lbs PM}_{10}/\text{ton}) \\ &= 0.98 \end{aligned}$$

$$AER_{PM_{10}} = HAE_{PM_{10}} \times 0.98$$

AER				
Quarter	1 st	2 nd	3 rd	4 th
Average (tons/qtr)	0	0	5,539	11,017
HAE _{PM₁₀} (lbs PM ₁₀ /qtr)	0	0	4,841	9,629
AER _{PM₁₀} (lbs PM ₁₀ /qtr)	0	0	4,744	9,436

(D). Air Quality Improvement Deduction:

According to District Rule 2201 Section 6.5, 10% of the Actual Emission Reductions (AER) shall be deducted as an air quality improvement deduction. Therefore, the Air Quality Improvement Deduction will be calculated utilizing the following formula:

$$\text{Air Quality Improvement Deduction} = AER \times 0.10$$

Air Quality Improvement Deduction				
Quarter	1 st	2 nd	3 rd	4 th
AER _{PM₁₀} (lbs PM ₁₀ /qtr)	0	0	4,744	9,436
PM ₁₀ Deductions (lbs PM ₁₀ /qtr)	0	0	474	944

(E). Bankable Emission Reductions:

Bankable emission reductions are the Actual Emission Reductions (AER) minus the Air Quality Improvement Deductions:

$$\text{Bankable Emission Reductions} = AER - \text{Air Quality Improvement Deductions}$$

Bankable Emission Reductions				
Quarter	1 st	2 nd	3 rd	4 th
AER _{PM₁₀} (lbs PM ₁₀ /qtr)	0	0	4,744	9,436
PM ₁₀ Deductions (lbs PM ₁₀ /qtr)	0	0	474	944
Bankable PM ₁₀ Emission Reductions (lbs PM ₁₀ /qtr)	0	0	4,270	8,492



San Joaquin Valley Air Pollution Control District

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Permit Application For:

- AUTHORITY TO CONSTRUCT (ATC) - New Emission Unit.
- AUTHORITY TO CONSTRUCT (ATC) - Modification Of Emission Unit With Valid PTO/Valid ATC.
- AUTHORITY TO CONSTRUCT (ATC) - Renewal of Valid Authority to Construct.
- PERMIT TO OPERATE (PTO) - Existing Emission Unit Now Requiring a Permit to Operate.

1. PERMIT TO BE ISSUED TO: <u>POHL ALMOND HULLING</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>1825 VERDUGA RD.</u> CITY: <u>HUGHSON</u> STATE: <u>CA.</u> 9-DIGIT ZIP CODE: <u>95326 95326</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>1825 VERDUGA RD.</u> CITY: <u>HUGHSON</u> _____/4 SECTION _____ TOWNSHIP _____ RANGE _____	WITHIN 1,000 FT OF A SCHOOL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO S.I.C. CODE(S) OF FACILITY (If known):
4. GENERAL NATURE OF BUSINESS: <u>ALMOND PRECLEANING</u>	INSTALL DATE:
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC? <input type="checkbox"/> YES <input type="checkbox"/> NO	
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary): <u>TO HAVE THE ERCs ISSUED BEFORE PERFORMING THE REQUIRED SOURCE TEST BY MODIFYING PERMIT N-2110-1-1 TO ADD A CONDITION TO SOURCE TEST THE BAGHOUSE SERVING THE ALMOND RECEIVING AND PRECLEANING OPERATION</u>	
7. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input type="checkbox"/> YES <input type="checkbox"/> NO If yes, ATC/PTO #: _____	Optional Section 10 CHECK WHETHER YOU ARE A PARTICIPANT IN EITHER OF THESE VOLUNTARY PROGRAMS: "SPARE THE AIR"  <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Send info "INSPECT"  <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Send info
8. IS THIS PROPERTY ZONED PROPERLY FOR THE PROPOSED USE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
9. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If yes, NOV/NTC #: _____	
11. TYPE OR PRINT NAME OF APPLICANT: <u>BRYAN D. HOLMES</u>	TITLE OF APPLICANT:
12. SIGNATURE OF APPLICANT: <u>[Signature]</u> DATE: <u>12-18-00</u>	PHONE #: <u>(209) 883-4853</u> FAX #: <u>(209) 883-9200</u> E-MAIL:

FOR APCD USE ONLY:	
DATE STAMP <u>DEC 26 2000</u>	FILING FEE RECEIVED: \$ <u>20</u> CHECK #: _____ DATE PAID: _____ PROJECT #: _____ FACILITY ID: <u>2110</u>

Table 9.10.2.1-1 (Metric And English Units). EMISSION FACTORS FOR ALMOND PROCESSING^a

EMISSION FACTOR RATING: E

Source	Filterable PM		Condensable Inorganic PM		PM-10 ^b	
	kg/Mg	lb/ton	kg/Mg	lb/ton	kg/Mg	lb/ton
Unloading ^c (SCC 3-02-017-11)	0.030	0.060	ND	ND	ND	ND
Precleaning cyclone ^d (SCC 3-02-017-12)	0.48	0.95	ND	ND	0.41	0.82
Precleaning baghouse ^e (SCC 3-02-017-12)	0.0084	0.017	ND	ND	0.0075	0.015
Hulling/separating cyclone ^d (SCC 3-02-017-13)	0.57	1.1	ND	ND	0.41	0.81
Hulling/separating baghouse ^e (SCC 3-02-017-13)	0.0078	0.016	ND	ND	0.0065	0.013
Hulling/shelling baghouse ^f (SCC 3-02-017-14)	0.026	0.051	0.0068	0.014	ND	ND
Classifier screen deck cyclone ^d (SCC 3-02-017-15)	0.20	0.40	ND	ND	0.16	0.31
Air leg ^d (SCC 3-02-017-16)	0.26	0.51	ND	ND	ND	ND
Roaster ^g (SCC 3-02-017-17)	ND	ND	ND	ND	ND	ND

^a Process weights used to calculate emission factors include nuts and orchard debris as taken from the field, unless noted. ND = no data. SCC = Source Classification Code.

^b PM-10 factors are based on particle size fractions found in Reference 1 applied to the filterable PM emission factor for that source. See Reference 3 for a detailed discussion of how these emission factors were developed.

^c References 1-3,10-11.

^d Reference 1. Emission factor is for a single air leg/classifier screen deck cyclone. Facilities may contain multiple cyclones.

^e References 1,9.

^f Reference 10.

^g Factors are based on finished product throughputs.

Compliance Source Test Report

**Submitted To:
Pohl & Holmes
Hughson, CA**

**Particulate Matter Compliance Testing
Of Two Baghouses**

**Test Date(s): December 10 and 11th, 2001
Submitted On: January 16th, 2002**

**Submitted By:
Advanced Air Testing, LLC
23588 Connecticut Street Bldg #1
Hayward, CA 94545
(510) 785-2030 FAX (510) 785-2039
Email: airtest@pacbell.net**

*N-2110
Source Tests*

Advanced Air Testing, LLC

• Stationary Source Emission Testing • Air Pollution Testing •

23588 Connecticut Street
Building # 1
Hayward, California 94545-1640
(510) 785-2030
(510) 785-2039 Fax

Email: airtest@pacbell.net

November 13, 2001

Attn: Kai Chan
San Joaquin Valley Unified APCD
4230 Kieman Avenue, Suite #130
Modesto, CA 95356

Re: Source Test Plan for compliance emissions testing of a baghouse located on the Almond receiving and Pre-Cleaning Operation (ATC# N-2110-1-2) and a baghouse located on the Almond Shelling Operation (ATC# N-2110-2-2). Both baghouses are owned and operated by Pohl Almond Hulling, 1825 Verduga Road, Hughson, California. Testing is to assess compliance with District Rule 2201 and the ATC's.

Dear Kai:

Advanced Air Testing, LLC (AAT) proposes the following methodology to perform the compliance testing referenced above.

- Three 60-minute tests will be performed at the outlets of both baghouses for PM₁₀ using EPA Method EPA 201A or EPA 17 with EPA Method 202. ✓
- Moisture, Volumetric Flow Rate and Molecular Weight will be determined using EPA Methods 1, 2, 3, & 4, as an integral part of the particulate matter testing.
- Three copies of a technical report will be submitted to Pohl Almond Hulling within four to six weeks of test completion. The report will include a test program description and tables presenting concentrations (gm/dscf), emission factors (gm/ton, as described by the ATC) and emission rates (lbs/hr). This report will include all supporting documentation (strip charts, field data sheets, calibrations, calculations, etc). Documentation of operating parameters will also be included in the final report.

Pending your approval, the tests are scheduled for December 10th & 11th, 2001 with an arrival time of 8 AM and testing to begin at ≈11 AM. Mr. Bryan Holmes is our site contact and may be reached at (209) 883-4853. If you have any questions, please contact myself or Dan Cartner at (510) 785-2030.

Respectfully Yours,



Sherman Smith
Operations Manager

cc: Mr. Bryan Holmes, Pohl & Holmes

Accurate Air Pollution Testing Services

Advanced Air Testing LLC

• Stationary Source Emission Testing • Air Pollution Testing •

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Email: airtest@pacbell.net

January 18, 2002

Pohl & Holmes
1825 Verduga Road
Hughson, CA 95326

Attn.: Brian Holmes

Subject: Compliance emission test report for the almond receiving and precleaning operation baghouse, and the almond hulling/shelling baghouse. Reference PTO #N-2110-1-2 and N-2110-2-2.

Test Date(s): December 10th and 11th, 2001.

Test Results: The comprehensive test results are presented in Tables 1 and 2. The table below summarizes the test results of both baghouses and their respective limits. These results show that the pre-cleaner baghouse comply with the requirements of the SJVUAPCD permit limit and that the Sheller baghouse emissions were out of compliance.

PARAMETER	Pre-Cleaner Baghouse	Sheller Baghouse	PERMIT LIMIT
Particulate, lbs/field ton	0.0081		0.0155
Particulate, lbs/meat ton		1.09	0.33

Sampling Location: The baghouses are located at the Pohl & Holmes almond hulling facility located at the address above. The samples were taken from a two test ports located on each of the baghouse exhaust vents. The sample ports on the precleaning operation baghouse were located approximately 5 diameters downstream and 1 diameter upstream of any flow disturbance, and the hulling/shelling baghouse ports were located approximately 6 diameters downstream and 1.5 diameters upstream of any flow disturbance.

Sampling Personnel: Jeff Mesloh and Burt Kusich of Advanced Air Testing, LLC.

Observing Personnel: Kai Chan of the San Joaquin Valley Unified Air Pollution Control District was present to observe the test program.

Process Description: Pohl & Holmes operates two permitted emission sources requiring abatement by baghouses. The first is the almond receiving area and pre-cleaning operation. This is the area where the almonds are initially received from the field and all foreign material such as leaves, twigs and dirt is removed. The second operation is the hulling and shelling process where the almond meat is separated from the shells.

Test Program: Three 60-minute duration tests runs were performed on the vent of each baghouse. The processes did not include any combustion sources, so the O₂ was assumed to be ambient. Product throughput for each baghouse was calculated by averaging the batch weights of the raw product from the field for the receiving area / pre-cleaning operation and the average batch weights of almond meat for the emissions calculations of the sheller baghouse.

Test QA/QC includes performing leak checks of the sampling system to the end of the sampling nozzle, both before and after the test run, leak checking the Pitot tubes and checking for cyclonic flows in the duct before starting the test.

Sampling Methods: The following Source Test Methods of the EPA or California Air Resources Board (CARB) were used:

EPA Method 5	Particulate Matter Determination
EPA Method 202A	Back-Half Condensables Determination

Instrumentation: The following field test equipment was used:

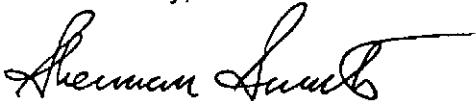
Lear-Sieglar Model LS-100 Method 5 Module
HP 42s Scientific Calculator with BASIC Isokinetic Program
K-Type Thermocouple with Beckman Industrial HD 110T Readout
Advanced Air Testing EPA M-5 Umbilical, Probes, and Impinger Set
Gelman 90mm Filters and Pyrex Holders
Air-guide Compensated Barometer

Comments: Calculations (A), laboratory data sheets (B), field data sheets (C), equipment calibration records (D), process data (E), stack diagrams (F), sampling system diagrams (G), source test plan (H), and Permit To Operate (I) are appended to this report.

The details and results contained within this report are to the best of AAT's knowledge an authentic and accurate representation of the test program. If this report is submitted for Compliance purposes it should only be reproduced in its entirety.

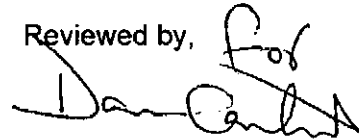
If there are any questions concerning this report, please contact Dan Cartner or me at (510) 785-2030.

Submitted by,



Sherman Smith
Operations Manager

Reviewed by,



Dan Cartner
Senior Project Manager

TABLE #1
Particulate Emissions Results
Pohl & Holmes
Precleaner Baghouse N-2110-12

RUN #	1	2	3	AVERAGE	LIMITS
TEST DATE	12-10-01	12-10-01	12-10-01		
TEST TIME	1011-1125	1438-1549	1353-1505		
PRODUCTION RATE, TPH	28.1	28.1	28.1		
SAMPLE VOLUME (DSCF)	44,542	37,472	37,951		
ISOKINETIC (%)	93.9	100.9	99.4	98.1	
DUCT TEMPERATURE (°F)	56.0	57.1	51.2	54.8	
VELOCITY (ft/sec)	40.4	40.3	40.9	40.5	
FLOW RATE (ACFM)	25,583	25,544	25,917	25,681	
FLOW RATE (DSCFM)	25,110	24,990	25,712	25,271	
H ₂ O (volume %)	0.6	0.7	0.5	0.6	
O ₂ (volume %)	20.9	20.9	20.9	20.9	
CO ₂ (volume %)	0.04	0.04	0.04	0.04	
F.H. Particulate Conc. (gr/DSCF)	0.0009	0.0008	0.0002	0.0006	
F.H. Particulate Emissions (Lbs/hr)	0.19	0.18	0.04	0.14	
Organic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Organic Particulate Emissions (Lbs/hr)	0.04	0.04	0.04	0.04	
Inorganic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Inorganic Particulate Emissions (Lbs/hr)	0.0447	0.0529	0.0448	0.0475	
Tot. Particulate Conc. (gr/DSCF)	0.0013	0.0013	0.0006	0.0011	
Tot. Particulate Emissions (Lbs/hr)	0.28	0.27	0.13	0.23	
Emission Factor, lbs/field ton	0.0098	0.0097	0.0048	0.0081	0.0155

WHERE

DSCF = Sample Volume in Dry Standard Cubic Feet

(X) DSCFM = Dry Standard Cubic Feet per Minute

ACFM = Actual Cubic Feet per Minute

H₂O, volume % = Stack gas percent water vapor

gr/DSCF = Particulate concentration in grains per DSCF

F.H. Particulate = Filterable Particulates

Organic Particulate = Condensible Organic Particulate (solvent extract)

- Inorganic Particulate = Condensible Inorganic Particulate (Acids & Sulfates)

CALCULATIONS

Lbs/hr Emission Rate = 0.00857 * gr/DSCF * DSCFM

Correction to 12% CO₂ = gr/DSCF * 12 / CO₂%

TABLE #2

Particulate Emissions Results

Pohl & Holmes
Sheller Baghouse #2 N-2110-2.2

RUN #	1	2	3	AVERAGE	LIMITS
TEST DATE	12-10-01	12-10-01	12-10-01		
TEST TIME	1011-1125	1216-1330	1353-1505		
PRODUCTION RATE, TPH	2.16	2.16	2.16		
SAMPLE VOLUME (DSCF)	43,634	44,526	44,379		
ISOKINETIC (%)	99.9	97.9	99.4	99.0	
DUCT TEMPERATURE (°F)	46.8	52.6	54.1	51.2	
VELOCITY (ft/sec)	46.4	49.0	48.0	47.8	
FLOW RATE (ACFM)	54,703	57,741	56,592	56,345	
FLOW RATE (DSCFM)	54,666	56,936	55,871	55,824	
H ₂ O (volume %)	0.4	0.6	0.2	0.4	
O ₂ (volume %)	20.9	20.9	20.9	20.9	
CO ₂ (volume %)	0.04	0.04	0.04	0.04	
F.H. Particulate Conc. (gr/DSCF)	0.0004	0.0002	0.0003	0.0003	
F.H. Particulate Emissions (Lbs/hr)	0.21	0.10	0.15	0.16	
Organic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Organic Particulate Emissions (Lbs/hr)	0.08	0.08	0.12	0.09	
Inorganic Particulate Conc. (gr/DSCF)	0.0045	0.0013	0.0075	0.0044	
Inorganic Particulate Emissions (Lbs/hr)	2.12	0.63	3.58	2.11	
Tot. Particulate Conc. (gr/DSCF)	0.0052	0.0017	0.0080	0.0050	
Tot. Particulate Emissions (Lbs/hr)	2.41	0.81	3.85	2.36	
Emission Factor, lbs/meat ton	1.12	0.38	1.78	1.09	0.33

WHERE

DSCF = Sample Volume in Dry Standard Cubic Feet

DSCFM = Dry Standard Cubic Feet per Minute

ACFM = Actual Cubic Feet per Minute

H₂O, volume % = Stack gas percent water vapor

gr/DSCF = Particulate concentration in grains per DSCF

F.H. Particulate = Filterable Particulates

Organic Particulate = Condensible Organic Particulate (solvent extract)

Inorganic Particulate = Condensible Inorganic Particulate (Acids & Sulfates)

CALCULATIONS

Lbs/hr Emission Rate = 0.00857 * gr/DSCF * DSCFM

Correction to 12% CO₂ = gr/DSCF * 12 / CO₂%

Advanced Air Testing, LLC

• Stationary Source Emission Testing • Air Pollution Testing •

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Hayward, California 94545-1640
(510) 785-2030
(510) 785-2039 Fax
Email: airtest@pacbell.net

FAX SOURCE TEST PLAN

Attn: Ron Gianonne or Lisa Middleton 209 557 6475 September 16, 2002
San Joaquin Valley Unified APCD
4230 Kieman Avenue, Suite #130
Modesto, CA 95356

Re: Revised - Source Test Plan for compliance emissions testing of a baghouse located at the Pohl & Holmes Almond Shelling Operation (ATC# N-2110-2-2). Testing is to assess compliance with District Rule 2201 and the ATC's.

Dear Ron or Lisa:

Advanced Air Testing, LLC (AAT) proposes the following methodology to perform the compliance testing referenced above.

- Simultaneous triplicate 60-minute test runs will be performed at the outlet and at the approximate inlet for filterable particulate using EPA 201A with EPA Method 202 (Back-Half Condensables). The inlet location will be performed to demonstrate background particulates to be subtracted from the outlet emissions
- Moisture, Volumetric Flow Rate and Molecular Weight will be determined using EPA Methods 1, 2, 3, & 4, as an integral part of the particulate matter testing.
- Three copies of a technical report will be submitted to Pohl Almond Hulling within four to six weeks after test completion. The report will include a test program description and tables presenting concentrations (gm/dscf), emission factors (gm/ton, as described by the ATC) and emission rates (lbs/hr). This report will include all supporting documentation (strip charts in color, field data sheets, calibrations, calculations, etc). Documentation of operating parameters will also be included in the final report.

Pending your approval, the testing is scheduled for October 15th, 2002 with an arrival time of 9 AM and testing to begin at ≈11 AM. Mr. Bryan Holmes is our site contact and may be reached at (209) 883-4853. If you have any questions, please contact Dan Cartner or myself at (510) 785-2030.

Respectively submitted,


Tammi Kelly
Operations Manager

cc: Mr. Bryan Holmes, Pohl & Holmes

RECEIVED
SEP 16 2002
SAN JOAQUIN VALLEY
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NO. REGION

Advanced Air Testing, LLC

• Stationary Source Emission Testing • Air Pollution Testing •

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Email: airtest@pacbell.net

September 14, 2002

Attn: Ron Gianonne
San Joaquin Valley Unified APCD
4230 Kiernan Avenue, Suite #130
Modesto, CA 95356

Re: Source Test Plan for compliance emissions testing of a baghouse located at the Pohl & Holmes Almond Shelling Operation (ATC# N-2110-2-2). Testing is to assess compliance with District Rule 2201 and the ATC's.

Dear Ron:

Advanced Air Testing, LLC (AAT) proposes the following methodology to perform the compliance testing referenced above.

- Simultaneous triplicate 60-minute test runs will be performed at the outlet and at the approximate inlet for filterable particulate using EPA 201A or EPA 17 with EPA Method 202 (Back-Half Condensibles). The inlet location will be performed to demonstrate background particulates to be subtracted from the outlet emissions. *not approved for PM10*
- Moisture, Volumetric Flow Rate and Molecular Weight will be determined using EPA Methods 1, 2, 3, & 4, as an integral part of the particulate matter testing.
- Three copies of a technical report will be submitted to Pohl Almond Hulling within four to six weeks of test completion. The report will include a test program description and tables presenting concentrations (gm/dscf), emission factors (gm/ton, as described by the ATC) and emission rates (lbs/hr). This report will include all supporting documentation (strip charts, field data sheets, calibrations, calculations, etc). Documentation of operating parameters will also be included in the final report.

Pending your approval, the testing is scheduled for October 15th, 2002 with an arrival time of 9 AM and testing to begin at ~11 AM. Mr. Bryan Holmes is our site contact and may be reached at (209) 883-4853. If you have any questions, please contact Tammi Kelly or myself at (510) 785-2030.

Respectfully Yours,



Dan Cartner
Sr. Operations Manager

cc: Mr. Bryan Holmes, Pohl & Holmes

Accurate Air Pollution Testing Services

Compliance Source Test Report

RECEIVED

DEC 11 2002

SAN JUAQUIN VALLEY
UNIFIED A.P.C.D.
NO. REGION

Submitted To:
Pohl & Holmes
Hughson, CA

**Particulate Matter (PM₁₀) Compliance Testing
On The Sheller Baghouse**

SJVAPCD #N-2110-2-2

Test Date(s): October 16th, 2002
Submitted On: November 29, 2002

Submitted By:
Advanced Air Testing, LLC
23588 Connecticut Street Bldg #1
Hayward, CA 94545
(510) 785-2030 FAX (510) 785-2039
Email: airtest@pacbell.net

N-2110
source tests

Advanced Air Testing LLC

• Stationary Source Emission Testing • Air Pollution Testing •

23588 Connecticut Street
Building # 1
Hayward, California 94545-1640
(510) 785-2030
(510) 785-2039 Fax
Email: airtest@pacbell.net

December 3, 2002

Pohl & Holmes Almond Shelling Operation
1825 Verduga Road
Hughson, CA 95326

Attn.: Bryan Holmes

Subject: Compliance emissions test report for the Sheller Baghouse located at the address above.
Reference: PTO N-2110-2-2.

Test Date(s): October 16th, 2002.

Test Results: The comprehensive test results are presented in Tables 1 and 2 following this text. The table below summarizes the test results of the baghouse and the respective limits.

PARAMETER	Sheller Baghouse	PERMIT LIMIT
Particulate, lbs/meat ton	0.10	0.33

Sampling Location: Sampling was conducted at the test port located on the baghouse exhaust vent. The sample ports on the baghouse outlet was modified to accommodate located approximately 6 diameters downstream and 1.5 diameters upstream of any flow disturbance.

Sampling Personnel: Jeff Mesloh and Burt Kusich of Advanced Air Testing, LLC.

Observing Personnel: Ms. Jennifer McKinney of the San Joaquin Valley Unified Air Pollution Control District was present to observe the test program.

Process Description: Pohl & Holmes operates two permitted emission sources requiring abatement by baghouses. The first is the almond receiving area and pre-cleaning operation. This is the area where the almonds are initially received from the field and all foreign material such as leaves, twigs and dirt is removed. **The second operation is the hulling and shelling process where the almond meat is separated from the shells.** The process rate for the test day was running at 3.97 tons/hr.

Test Program: Three 90-minute tests runs were performed for PM₁₀ emissions at the baghouse outlet. Volumetric flow rates were determined in conjunction with the PM₁₀ test runs.

Each particulate sample train was recovered on-site, with the samples placed in uniquely labeled sample containers. The samples were returned to AAT and analyzed according to EPA Methods 201A & 202.

Product throughput for the baghouse was calculated by averaging the batch weights of almond meat for the emissions calculations of the Sheller baghouse.

Test QA/QC includes performing leak checks of the sampling system to the end of the sampling nozzle, both before and after the test run, leak checking the pitot tubes and checking for cyclonic flows in the duct before starting the test.

Sampling Methods: The following Source Test Methods of the EPA or California Air Resources Board (CARB) were used:

EPA Method 201A	10 micron Particulate Matter Determination
EPA Method 202	Back-Half Condensables Determination

Instrumentation: The following field test equipment was used:

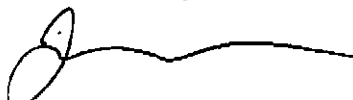
RAC Method 5 Module
HP 42s Scientific Calculator with BASIC Isokinetic Program
K-Type Thermocouple with Beckman Industrial HD 110T Readout
Advanced Air Testing EPA M-5 Umbilical, Probes, and Impinger Set
PM₁₀ cyclones and Gelman 90mm Filters
Air-guide Compensated Barometer
American Scientific Products M182 Analytical Balance (Lab)

Comments: Calculations (A), laboratory report & data sheets (B), field data sheets (C), equipment calibration records (D), process data (E), sampling system diagram(s) (F), source test plan (G), and Permit to Operate (H) are appended to this report.

The details and results contained within this report are to the best of AAT's knowledge an authentic and accurate representation of the test program. If this report is submitted for Compliance purposes it should only be reproduced in its entirety.

If there are any questions concerning this report, please contact Dan Cartner or me at (510) 785-2030.

Submitted by,



Tammi Kelly
Operations Manager

Reviewed by,



Dan Cartner
Senior Source Test Manager

TABLE 1
M201A & 202 PM₁₀ PARTICULATE RESULTS

Pohl & Holmes
Sheller Baghouse
ATC #N-2110-2-2

RUN #	1	2	3	AVERAGE	LIMITS
TEST DATE	10-16-02	10-16-02	10-16-02		
PROCESS RATE, (tons/hr)	3.97	3.97	3.97		
CYCLONE CUTPOINT	8.8	8.9	9.0		
SAMPLE VOLUME (DSCF)	46.889	44.993	44.515		
ISOKINETIC (%)	95.3	97.1	93.6		
DUCT TEMP., (°F)	64.0	70.6	72.4	69.0	
VELOCITY (ft/sec)	65.57	63.18	64.68	64.48	
FLOW RATE (ACFM)	77,225	74,416	76,180	75,940	
FLOW RATE (DSCFM)	74,061	69,749	71,587	71,799	
H ₂ O (volume %)	0.7	1.7	1.1	1.2	
O ₂ (volume %)	21.00	21.00	21.00	21.00	
CO ₂ (volume %)	0.05	0.05	0.05	0.05	
PM ₁₀ Filterable Conc. (gr/DSCF)	0.0001	0.0001	0.0001	0.0001	
PM ₁₀ Filterable Emissions (Lbs/hr)	0.06	0.04	0.05	0.05	
PM ₁₀ Condensable Conc. (gr/DSCF)	0.0003	0.0011	0.0003	0.0006	
PM ₁₀ Condensable Emissions (Lbs/hr)	0.21	0.68	0.21	0.37	
PM ₁₀ Total Conc. (gr/DSCF)	0.0004	0.0012	0.0004	0.0007	
PM ₁₀ Total Emissions (Lbs/hr)	0.27	0.72	0.27	0.42	
PM ₁₀ Total Emission Factor (lbs/ton of product)	0.0684 ✓	0.1807	0.0670	0.1054	0.33 ✓

WHERE

DSCF = Sample Volume in Dry Standard Cubic Feet

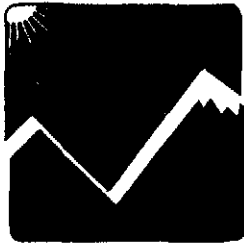
DSCFM = Dry Standard Cubic Feet per Minute

ACFM = Actual Cubic Feet per Minute

H₂O, volume % = Stack gas percent water vapor

gr/DSCF = Particulate concentration in grains per DSCF

PM₁₀ = Particulate & Condensable Matter smaller than 10 microns in diameter



San Joaquin Valley Unified Air Pollution Control District

N-212-4

APPLICATION FOR:

EMISSION REDUCTION CREDIT (ERC)
 CONSOLIDATION OF ERC CERTIFICATES

ERC RE-ISSUE AFTER PARTIAL USE
 ERC TRANSFER OF OWNERSHIP

1. ERC TO BE ISSUED TO: <i>POHL & HOLMES ALMOND HULLING</i>																																											
2. MAILING ADDRESS: Street/P.O. Box: <i>1825 VERDUGA RD.</i> City: <i>HUGHSON</i> State: <i>CA</i> Zip Code: <i>95326</i>																																											
3. LOCATION OF REDUCTION: Street: <i>1825 VERDUGA RD.</i> City: <i>HUGHSON</i>	4. DATE OF REDUCTION: _____																																										
5. PERMIT NO(S): <i>N-2110-1-0</i> EXISTING ERC NO(S): _____																																											
6. METHOD RESULTING IN EMISSION REDUCTION: <input type="checkbox"/> SHUTDOWN <input checked="" type="checkbox"/> RETROFIT <input type="checkbox"/> PROCESS CHANGE <input type="checkbox"/> OTHER DESCRIPTION: <i>DISTRICT 2 SECTION 7 T-045 RANGE 11E</i> ^{BASE M} (Use additional sheets if necessary)																																											
7. REQUESTED ERCs (In Pounds Per Calendar Quarter):																																											
	<table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th></th> <th>VOC</th> <th>NOx</th> <th>CO</th> <th>PM10</th> <th>SOx</th> <th>OTHER</th> </tr> </thead> <tbody> <tr> <td>1st QTR</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2nd QTR</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>3rd QTR</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>4th QTR</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>TOTAL COST</td> <td>\$</td> <td>\$</td> <td>\$</td> <td>\$</td> <td>\$</td> <td>\$</td> </tr> </tbody> </table>		VOC	NOx	CO	PM10	SOx	OTHER	1st QTR							2nd QTR							3rd QTR							4th QTR							TOTAL COST	\$	\$	\$	\$	\$	\$
	VOC	NOx	CO	PM10	SOx	OTHER																																					
1st QTR																																											
2nd QTR																																											
3rd QTR																																											
4th QTR																																											
TOTAL COST	\$	\$	\$	\$	\$	\$																																					
8. SIGNATURE OF APPLICANT: <i>Martin Pohl</i>	TYPE OR PRINT TITLE OF APPLICANT: <i>PARTNER</i>																																										
9. TYPE OR PRINT NAME OF APPLICANT: <i>MARTIN POHL</i>	DATE: <i>6-15-00</i> TELEPHONE NO: <i>(209) 883 4853</i>																																										

FOR APCD USE ONLY: *OTC 6-15-00*

<h1 style="font-size: 2em; margin: 0;">RECEIVED</h1> <p style="font-size: 1.2em; margin: 5px 0;">JUN 15 2000</p> <p style="margin: 5px 0;">SAN JOAQUIN VALLEY UNIFIED A.P.C.D. NO. REGION</p>	FILING FEE RECEIVED: <i>\$650.00 # 1527</i> DATE PAID: <i>6-15-00</i> PROJECT NO.: <i>1000509 N-2110</i>	<h1 style="font-size: 2em; margin: 0;">RECEIVED</h1> <p style="font-size: 1.2em; margin: 5px 0;">JUN 15 2000</p> <p style="margin: 5px 0;">SAN JOAQUIN VALLEY UNIFIED A.P.C.D. NO. REGION</p>
---	--	---

POHL & HOLMES
MEAT WEIGHT FROM PRECLEANER.

• 1998 Production Records

Huller/Sheller
Add'l Shelling

1,884,879

2,246,308

AUG. SEPT. OCT.

4,791,824

• 1999 Production Records

Huller/Sheller
Add'l Shelling

5,617,803

2,812,066

SEPT. OCT. NOV.

8,429,869



San Joaquin Valley
Unified Air Pollution Control District

Permit to Operate

FACILITY ID: N-2110

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: POHL ALMOND HULLING

MAILING ADDRESS: 1825 VERDUGA ROAD
HUGHSON, CA 95326

FACILITY LOCATION: 1825 VERDUGA ROAD, HUGHSON

FACILITY DESCRIPTION: AGRICULTURAL PRODUCTS PROCESSING - ALMONDS

The facility's Permit to Operate may include facilitywide 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.

David L. Crow
Executive Director/APCO

Seyed Sadredin
Director of Permit Services

Northern Region * 4230 Kiernan Ave., Suite 130 * Modesto, CA 95356
(209) 545-7000 * FAX (209) 545-8652

***San Joaquin Valley Unified
Air Pollution Control District***

PERMIT UNIT: N-2110-1-0

EXPIRATION DATE: 07/31/2003

EQUIPMENT DESCRIPTION:

ALMOND PRECLEANING OPERATION CONSISTING OF ONE (1) LMC PRECLEANER, ONE (1) TRIPLE S DESTONER AND ASSOCIATED CONVEYORS/ELEVATORS SERVED BY A CYCLONE.

Permit Unit Requirements

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080]
2. The drop from the dirt elevators shall be kept at a minimum to prevent excessive dusting. [District Rule 2080]

These terms and conditions are part of the facilitywide Permit to Operate.

POHL & HOLMES HULLING
1825 VERDUGA ROAD
HUGHSON, CA 95326
PH. 209-883-4853

WELLS FARGO BANK
440 EAST OLIVE STREET
TURLOCK, CA 95380
11-24/1210(8)

1527

DATE

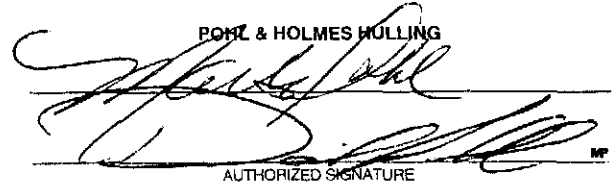
AMOUNT

6/15/00

\$650.00

PAY Six Hundred Fifty Dollars And 00 Cents

TO THE ORDER OF SJVUAPCD
4230 Kiernan Ave., Suite 130
Modesto CA 95356

POHL & HOLMES HULLING

AUTHORIZED SIGNATURE

⑈001527⑈ ⑆121000248⑆0256 066085⑈

SECURITY FEATURES INCLUDED. DETAILS ON BACK.

PROJECT ROUTING FORM

PROJECT NUMBER: 1000509 FACILITY ID: 2110 PERMIT NOS: N-212-4 (ERC#)

APPLICANT NAME: POHL & HOMES ALMOND HULLING

PREMISE ADDRESS: 1825 VERDUGA ROAD, HUGHSON

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete				
B. Application Deemed Complete <input type="checkbox"/> Awaiting CB Offsets				
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INIT	DATE
E. Engineering Evaluation Complete	<i>ke</i>	<i>12/4/01</i>
F. Supervising Engineer Approval		
G. Compliance Division Approval <input type="checkbox"/> Not Required		
H. Permit Services Manager Approval	<i>[Signature]</i>	<i>9/22/08</i>

Director Review: Not Required Required

CLERICAL STAFF: Perform tasks as indicated below. Initial and date when completed.

- PRELIMINARY REVIEW**
- _____ Mail Incompleteness Letter to the Applicant.
 - _____ Mail Completeness Letter to the Applicant.
 - _____ Mail Intent to Deny Letter to the Applicant (**Certified Mail**).
 - _____ Mail Denial Letter to the Applicant (**Certified Mail**).

PROJECTS NOT REQUIRING PUBLIC NOTIFICATION

- PRELIMINARY DISPOSITION:** _____ Mail Imminent Denial Letter to the Applicant (**Certified Mail**).
- FINAL DISPOSITION:** _____ Mail ATC(s) to Distribution.
- _____ Mail Denial Letter to the Applicant (**Certified Mail**).

PROJECTS REQUIRING PUBLIC NOTIFICATION

- PRELIMINARY DECISION:** _____ Deliver Ad to the Newspaper NOT LATER THAN
- _____ Mail copies of Cover Letter and Engineering Evaluation to Distribution.
- FINAL DECISION:** _____ Deliver Ad to the Newspaper NOT LATER THAN
- _____ Mail copies of Cover Letter and ATC(s) to Distribution.
- _____ Mail copies of Cover Letter to Distribution.

DISTRIBUTION

- _____ APPLICANT _____ EPA - 75 Hawthorne St., San Francisco, CA 94105 Attn: A-3-4
- _____ ENGINEER _____ ARB - Stationary Source Div. Chief, PO Box 2815, Sacramento, CA 95812
- _____ COMPLIANCE _____ SJVUAPCD - 1990 E. Gettysburg Ave., Fresno, CA 93726 Attn: Seyed Sadrocin
- _____ PREMISE FILE
- _____ BLDG DEPT _____ _____ OTHER
- _____ FIRE DEPT _____ _____ SCHOOL

RECEIVED

SEP 24 2008

SJVAPCD
NORTHERN REGION

- NORTHERN REGION
- CENTRAL REGION
- SOUTHERN REGION

ERC/PUBLIC NOTICE CHECK LIST

PROJECT #s: N-1000509

REQST. COMPL.

- ERC TRANSFER OF PREVIOUSLY BANKED CREDITS
- ERC PRELIMINARY PUBLIC NOTICE
- ERC FINAL PUBLIC NOTICE
- NSR/CEQA PRELIMINARY PUBLIC NOTICE
- NSR/CEQA FINAL PUBLIC NOTICE

Date Completed [DATE COMPLETED] /By [SELECT SUPERVISOR]

Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)

ENCLOSED DOCUMENTS REQUIRE:

Enter Correct Date, Print All Documents from File and Obtain Directors Signature

Send **PRELIMINARY** Notice Letters to CARB, EPA and Applicant; Including the Following Attachments:

- Application Evaluation
- Other Public Notice

Send **PRELIMINARY** Public Notice for Publication to Modesto Bee

Send Signed Copies of **PRELIMINARY** Notice Letters to: Kai Chan

Director's Signature and District Seal Embossed on ERC Certificates

Director's Signature on Cover Letter and Mail Cover Letter & ERC Certificates by Certified Mail to:

- Applicant:
- Applicant and Additional Addressees (see cover letters)
- Other

Send Copies of Signed and Seal Embossed ERC Certificates and Signed cover letter to Regional Office Attn:

Other Special Instructions (please specify): _____

SEP 23 2008 / *mw*



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 23 2008

Bryan Holmes
Pohl Almond Hulling
1825 Verduga Road
Hughson, CA 95326

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: N-1000509

Dear Mr. Holmes:

Enclosed for your review and comment is the District's analysis of Pohl Almond Hulling's application for Emission Reduction Credits (ERCs) resulting from the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs proposed for banking is 12,790 pounds of PM10 per calendar year.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Kai Chan of Permit Services at (209) 557-6451.

Sincerely,

David Warner
Director of Permit Services

DW:KC/nw

Enclosures

Seyed Sadredin

Executive Director/Air Pollution Control Officer

Northern Region

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

Central Region (Main Office)

1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org

Southern Region

2700 M Street, Suite 275
Bakersfield, CA 93301-2373
Tel: (661) 326-6900 FAX: (661) 326-6985



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 23 2008

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: N-1000509

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Pohl Almond Hulling's application for Emission Reduction Credits (ERCs) resulting from the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs proposed for banking is 12,790 pounds of PM10 per calendar year.

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Sincerely,

David Warner
Director of Permit Services

DW:KC/nw/nw

Enclosure

Seyed Sadredin

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www.valleyair.org

Southern Region

2700 M Street, Suite 275
Bakersfield, CA 93301-2373
Tel: (661) 326-6900 FAX: (661) 326-6985



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 23 2008

Gerardo C. Rios (AIR 3)
Chief, Permits Office
Air Division
U.S. E.P.A. - Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: N-1000509

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Pohl Almond Hulling's application for Emission Reduction Credits (ERCs) resulting from the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs proposed for banking is 12,790 pounds of PM10 per calendar year.

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Sincerely,

David Warner
Director of Permit Services

DW:KC/nw/nw

Enclosure

Seyed Sadredin

Executive Director/Air Pollution Control Officer

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4800 Enterprise Way
Modesto, CA 95356-8718
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Bakersfield, CA 93301-2373
Tel: (661) 326-6900 FAX: (661) 326-6985

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Classification: 8000 - Public Notices

Modesto Bee

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to Pohl Almond Hulling for the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs proposed for banking is 12,790 pounds of PM10 per calendar year.

The analysis of the regulatory basis for this proposed action, Project #N-1000509, is available for public inspection at the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356-8718. Pub Dates Sept 30, 2008

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Modesto Bee
Modesto Bee

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS**

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ERC Application Evaluation

(ERC Banking from the replacement of a Cyclone with a Baghouse)

Processing Engineer: Kai Chan

Lead Engineer: Mark Schonhoff

Date: December 28, 2001

Revised: September 22, 2008

Company Name: Pohl Almond Hulling

Mailing Address: 1825 Verduga Road
Hughson, CA 95326

Contact Name: Martin Pohl

Phone: (209) 883-4853

Project #: 1000509

Application #'s: N-212-4

Date Application Received: June 15, 2000

Date Application Deemed Complete: December 27, 2000

I. Summary:

The applicant is proposing to receive emission reduction credits (ERCs) for reductions in PM₁₀ emissions generated by replacing the existing cyclone serving the almond precleaning operation with a baghouse and the use of the baghouse to control emissions from the receiving equipment. The almond receiving and precleaning operation is operating under District Permit to Operate N-2110-1. The quantity of PM₁₀ ERCs will be:

Pollutant	Quarter 1 (lbs.)	Quarter 2 (lbs.)	Quarter 3 (lbs.)	Quarter 4 (lbs.)
PM ₁₀	0	0	4,279	8,511

II. Applicable Rules:

Rule 2301: Emission Reduction Credit Banking (Adopted September 19, 1991;
Amended March 11, 1992; Amended December 17, 1992)

III. Location Of Reductions:

The facility is located at 1825 Verduga Road in Hughson, CA.

IV. Method Of Generating Reductions:

The ERC's were generated by replacing the existing cyclone serving the almond precleaning operation with a baghouse and the use of the baghouse to also control emissions from the receiving equipment. The emissions from the almond receiving equipment were previously uncontrolled.

V. ERC Calculations:

A. Assumptions and Emission Factors:

The results of all Historical Actual Emission (HAE) and Actual Emission Reduction (AER) calculations are rounded to the nearest whole number.

Assumptions:

1. Control efficiency for the proposed new baghouse will be 99% for PM₁₀.
2. The results of ARB's particle size testing at several almond hulling facilities titled "Report on Tests of Emissions from Almond Hullers in San Joaquin Valley, ARB, April 1975" will be used to determine the PM₁₀ fraction of the total particulate matter emitted from the unloading of almonds. The average PM₁₀ fraction is determined as:

$$\text{Average PM}_{10} \text{ Fraction} = 0.9 \text{ lbs. PM}_{10}/\text{lb PM}$$

Emission Factors:

1. An emission factor for almond processing from AP-42, Table 9.10.2.1-1 (1/95) for the unloading operation (uncontrolled) will be utilized to calculate the PM₁₀ emission factors before and after the installation of the new baghouse. Therefore:

$$EF_{\text{PM/Receiving/Uncontrolled}} = 0.06 \text{ lbs. PM/fwt}$$

$$\begin{aligned} EF_{1/\text{Receiving}} &= \text{Pre-Modification Emission Factor (Receiving)} \\ &= EF_{\text{PM/Receiving/Uncontrolled}} \times \text{PM}_{10} \text{ Fraction} \\ &= 0.06 \text{ lbs. PM/fwt} \times 0.9 \text{ lbs. PM}_{10}/\text{lb. PM} \\ &= 0.054 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

$$\begin{aligned} EF_{2/\text{Receiving}} &= \text{Post-Modification Emission Factor} \\ &= EF_{1/\text{Receiving}} \times (1 - \text{Baghouse Control Efficiency}) \\ &= 0.054 \text{ lbs. PM}_{10}/\text{fwt} \times (1 - 0.99) \\ &= 0.00054 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

V. ERC Calculations (Continued):

2. Emission factors for almond processing from AP-42, Table 9.10.2.1-1 (1/95) for precleaning operation served by a cyclone and precleaning operation served by a baghouse will be utilized to calculate the PM₁₀ emissions before and after the replacement of the existing cyclone with the new baghouse.

$$\begin{aligned}
 EF_{1/\text{Precleaning}} &= \text{Pre-Modification Emission Factor (Precleaning)} \\
 &= EF_{\text{PM}_{10}/\text{Precleaning Cyclone}} = 0.82 \text{ lbs. PM}_{10}/\text{fwt} \\
 EF_{2/\text{Precleaning}} &= \text{Post-Modification Emission Factor (Precleaning)} \\
 &= EF_{\text{PM}_{10}/\text{Precleaning Baghouse}} = 0.015 \text{ lbs. PM}_{10}/\text{fwt}
 \end{aligned}$$

B. Baseline Period Determination and Data:

Baseline Period Determination:

Per District rule 2201 and District Policy APR 1810 the baseline period will be the two consecutive year period immediately preceding the application for the Authority to Construct authorizing the modification that resulted in the emission reductions being required. The baseline period for this emission unit will be the eight quarter period ending with the last complete quarter prior to the completed application for the ATC authorizing the installation of the baghouse. Specifically, the baseline period will be from April 1, 1998 through March 31, 2000.

Baseline Period Data:

Field Weight Tons (fwt) of Almonds Received & Precleaned				
Year	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
1998	---	0	3,993	7,986
1999	0	0	7,085	14,050
2000	0	---	---	---
Average	0	0	5,539	11,018

C. Historical Actual Emissions:

Historical Actual Emissions (HAE) are emissions having actually occurred and are calculated using process data and recognized emission factors, per Rule 2201, Section 6.2.1 (Amended June 15, 1995). The HAE will be calculated by multiplying the average amount of almonds processed in each quarter during the baseline period, as provided by the applicant, by the pre-modification emission factor. Therefore:

V. ERC Calculations (Continued):

$$\begin{aligned} \text{HAE}_{\text{PM}_{10}} &= \text{Average Process Rate (fwt/qtr)} \times (\text{EF}_{1/\text{Receiving}} + \text{EF}_{1/\text{Precleaning}}) \\ &= \text{Average Process Rate (fwt/qtr)} \times (0.054 \text{ lbs PM}_{10}/\text{fwt} + 0.82 \text{ lbs PM}_{10}/\text{fwt}) \\ &= \text{Average Process Rate (fwt/qtr)} \times 0.874 \text{ lbs PM}_{10}/\text{fwt} \end{aligned}$$

HAE _{PM10} (lbs PM ₁₀ /Qtr)				
Year	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
1998	---	0	3,490	6,980
1999	0	0	6,192	12,280
2000	0	---	---	---
Average	0	0	4,841	9,630

D. Actual Emission Reductions (AER):

AERs due to the installation of a control device is calculated using the following equation from District Rule 2201, Section 6.5.3 (Amended June 15, 1995):

$$\text{AER} = \text{HAE} \times \text{CE}$$

where, HAE = Historical Actual Emissions

CE = Control Efficiency of the proposed air pollution control technology

For the proposed replacement of the precleaner cyclone with a baghouse and the use of a baghouse on the receiving operation, the CE will be calculated based on the emission factors utilized to determine the pre-project actual emissions and the post-project permitted daily emission limits. Therefore:

$$\begin{aligned} \text{EF}_{1/\text{Total}} &= \text{EF}_{1/\text{Receiving/Uncontrolled}} + \text{EF}_{1/\text{Precleaning/Cyclone}} \\ &= 0.054 \text{ lbs. PM}_{10}/\text{fwt} + 0.82 \text{ lbs. PM}_{10}/\text{fwt} \\ &= 0.874 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

$$\begin{aligned} \text{EF}_{2/\text{Total}} &= \text{EF}_{2/\text{Receiving/Baghouse}} + \text{EF}_{2/\text{Precleaning/Baghouse}} \\ &= 0.00054 \text{ lbs. PM}_{10}/\text{fwt} + 0.015 \text{ lbs. PM}_{10}/\text{fwt} \\ &= 0.0155 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

$$\begin{aligned} \text{CE} &= (\text{EF}_{1/\text{Total}} - \text{EF}_{2/\text{Total}}) \div \text{EF}_{1/\text{Total}} \\ &= (0.874 \text{ lbs. PM}_{10}/\text{fwt} - 0.0155 \text{ lbs. PM}_{10}/\text{fwt}) \div 0.874 \text{ lbs. PM}_{10}/\text{fwt} \\ &= 0.982 \end{aligned}$$

$$\text{AER}_{\text{PM}_{10}} = \text{HAE}_{\text{PM}_{10}} \times 0.982$$

V. ERC Calculations (Continued):

AER _{PM10}				
Quarter	1 st	2 nd	3 rd	4 th
HAE _{PM10} (lbs PM ₁₀ /qtr)	0	0	4,841	9,630
AER _{PM10} (lbs PM ₁₀ /qtr)	0	0	4,754	9,457

E. Air Quality Improvement Deduction:

According to District Rule 2201 Section 6.5 (Amended June 15, 1995), 10% of the Actual Emission Reductions (AER) shall be deducted as an air quality improvement deduction. Therefore, the Air Quality Improvement Deduction will be calculated utilizing the following formula:

$$\text{Air Quality Improvement Deduction} = \text{AER} \times 0.10$$

Air Quality Improvement Deduction				
Quarter	1 st	2 nd	3 rd	4 th
AER _{PM10} (lbs PM ₁₀ /qtr)	0	0	4,754	9,457
PM ₁₀ Deductions (lbs PM ₁₀ /qtr)	0	0	475	946

F. Increase In Permitted Emissions:

There are no IPE's associated with this project.

G. Bankable Emissions Reductions:

Bankable emission reductions are the Actual Emission Reductions (AER) minus the Air Quality Improvement Deductions:

$$\text{Bankable Emission Reductions} = \text{AER} - \text{Air Quality Improvement Deductions}$$

Bankable Emission Reductions				
Quarter	1 st	2 nd	3 rd	4 th
AER _{PM10} (lbs PM ₁₀ /qtr)	0	0	4,754	9,457
PM ₁₀ Deductions (lbs PM ₁₀ /qtr)	0	0	475	946
Bankable PM ₁₀ Emission Reductions (lbs PM ₁₀ /qtr)	0	0	4,279	8,511

VI. Compliance:

A. Real Reductions:

The emission reductions were generated by the removal and replacement of the cyclone serving the precleaner with a baghouse and the use of the baghouse to also control emissions from the receiving equipment. If the modifications had not been done the emissions could have otherwise occurred. On December 10, 2001 a source test was conducted at the facility on the baghouse serving the precleaner and receiving equipment. The results of the source test indicated a maximum PM₁₀ emission rate of 0.0098 lb-PM₁₀/fwt, which verified compliance with the proposed PM₁₀ emissions limit of 0.0155 lb-PM₁₀/fwt. The District is satisfied that emissions in the amounts calculated did indeed occur. Therefore, the emission reductions are real.

B. Enforceable Reductions:

The reductions occurred as a result of the installation of the baghouse. The presence of the baghouse is required by permit conditions and can be verified during a site inspection. The resulting lower PM₁₀ emission limits are required by the conditions on the Permit to Operate and compliance with the limit was verified by a source test conducted at the facility on December 10, 2001. In addition, the PM₁₀ emission limit is a performance based limitation in pounds per field weight ton of almonds received and precleaned. The Permit to Operate and subsequent Permits to Operate for this almond receiving and precleaning operation will maintain the performance based limitation for PM₁₀. The conditions will include language stating that this condition is to enforce emission reductions of this project. This addition will ensure enforceability of the emission reduction credits for all future actions pertaining to this Permit to Operate. The performance based condition to enforce the PM₁₀ emission reductions from this project is as follows:

The PM₁₀ emissions from the almond receiving and precleaning operation shall not exceed 0.0155 pounds per field weight ton. This performance based limit is to enforce the PM₁₀ emission reductions granted by emission reduction credit certificate number N-212-4.

Therefore, the reductions are enforceable.

C. Quantifiable Reductions:

The reductions were calculated utilizing actual baseline period processing records provided by the applicant and District approved EPA AP42 emission factors. Therefore the reductions are quantifiable.

VI. Compliance (Continued):

D. Permanent Reductions:

The equipment description of the Permit to Operate lists a baghouse as required equipment, a PM₁₀ emission limit is present on the permit, and a source test to verify compliance with the emission limit has been performed. Therefore the reductions are permanent.

E. Surplus Reductions:

This section will contain an explanation of what actions were taken to ensure that all emission reductions during the baseline period were surplus.

1. Rules and Regulations:

District Rule 4201: Particulate Matter Concentration:

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

During the baseline period the almond receiving operation is uncontrolled and its particulate matter (PM) emissions are not vented through an exhaust stack. Only the PM emissions from the almond precleaner were vented through a cyclone.

Precleaner Cyclone:

PM Emission Factor: 0.95 lb/Field Weight Ton (fwt) (From AP-42, Table 9.10.2.1-1 for a precleaning cyclone - Updated 1/95)
Throughput: 320 fwt/day (Per applicant from Appendix II)
Max. Operating Hours: 24 hr/day (1,440 min/day)
Cyclone Exhaust Flow: 20,000 cfm⁽¹⁾ (From Project #N-1000330)

$$\begin{aligned} \text{PM Concentration} &= (320 \text{ fwt/day} \times 0.95 \text{ lb/fwt} \times 7,000 \text{ grains/lb.}) \\ &\div (20,000 \text{ cfm} \times 1,440 \text{ min/day}) \\ &= 0.074 \text{ grains/scf} \end{aligned}$$

Since the PM concentration is less than the allowable particulate matter concentration of this rule, the almond precleaning equipment operated in compliance with this rule during the baseline period.

¹ The almond receiving and precleaning operation was originally permitted by the Stanislaus County Air Pollution Control District in 1979. At that time the applicant did not provide the exhaust flow rate of the cyclone serving the precleaner. Therefore, an airflow of 20,000 cfm provided under project # N-1000330 for the airflow requirement of the replacement precleaner will be used to determine compliance with this rule.

VI. Compliance (Continued):

District Rule 4202: Particulate Matter – Emission Rate:

This rule limits the particulate matter (PM) emission rate from any source operation to the result of the following equation:

$$E_{\text{Max.}} = 3.59 P^{0.62}$$

where: E = Emissions in lb/hr

P = Process weight in ton/hr ($P \leq 30$ tons/hr)

Almond Receiving:

PM Emission Factor: 0.06 lb/fwt (From AP-42, Table 9.10.2.1-1 for Unloading - Updated 1/95)

Throughput: 320 fwt/day (Per applicant from Appendix II)

Max. Operating Hours: 24 hr/day

$$P = 320 \text{ fwt/day} \times 24 \text{ hr/day} = 13.33 \text{ fwt/hr}$$

$$E_{\text{Max}} = 3.59 \times (13.33)^{0.62} = 17.9 \text{ lb/hr}$$

$$E_{\text{Potential}} = 13.33 \text{ fwt/hr} \times 0.06 \text{ lb-TSP/fwt} = 0.8 \text{ lb-TSP/hr}$$

Since the potential PM Emission rate is less than the allowable maximum emission rate, the almond receiving equipment operated in compliance with this rule during the baseline period.

Almond Precleaning:

PM Emission Factor: 0.95 lb/fwt (From AP-42, Table 9.10.2.1-1 for a precleaning cyclone - Updated 1/95)

Throughput: 320 fwt/day (Per applicant from Appendix II)

Max. Operating Hours: 24 hr/day

$$P = 320 \text{ fwt/day} \times 24 \text{ hr/day} = 13.33 \text{ fwt/hr}$$

$$E_{\text{Max}} = 3.59 \times (13.33)^{0.62} = 17.9 \text{ lb/hr}$$

$$E_{\text{Potential}} = 13.33 \text{ fwt/hr} \times 0.95 \text{ lb-TSP/fwt} = 12.7 \text{ lb-TSP/hr}$$

Since the potential PM Emission rate is less than the allowable maximum emission rate, the almond precleaning equipment operated in compliance with this rule during the baseline period.

VI. Compliance (Continued):

2. Permitted Emission Limitations:

The almond receiving and precleaning permit did not contain any daily emission limits (or emission factor and process rates) during the baseline period. Daily emission limits were placed on the permit when the facility proposed to replace the existing cyclone with a baghouse under Authority to Construct (ATC) permits N-2110-1-1 and N-2110-1-2. All reductions during the baseline period are considered surplus.

3. Summary:

The almond receiving and precleaning equipment were found to be in compliance with all applicable Rules and Regulations, so no further adjustments were necessary. The emission reductions were made voluntarily and were not required by any present or pending regulation. Therefore, the emission reductions from the almond receiving and precleaning equipment are surplus.

F. Timeliness:

The date of the reductions was August 23, 2000, which was the date that the baghouse was installed and operated under normal conditions. The ERC application date was June 15, 2000. The applicant submitted the ERC application prior to the date of the reductions, which is shorter than the 180 days allowed by District rule 2301 Section 4.2.3. Therefore, the application was submitted in a timely manner.

VII. Recommendation:

Issue an Emission Reduction Credit Certificate to Pohl Almond Hulling for PM₁₀ in the following amounts:

Emission Reduction Credits				
Quarter	1 st	2 nd	3 rd	4 th
PM ₁₀ (lbs PM ₁₀ /qtr)	0	0	4,279	8,511

Appendix I: Copies of Authority to Construct Permits N-2110-1-1 & N-2110-1-2

Appendix II: Copy of Permit to Operate N-2110-1-2

Appendix III: Statement of Reduction Date and Quarterly Quantity of Almonds Received and Precleaned

Appendix VI: Copy of the Source Test Results for ATC Permit N-2110-1-2

Appendix I
ATC Permits N-2110-1-1 and N-2110-1-2



San Joaquin Valley
Air Pollution Control District

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2110-1-1

ISSUANCE DATE: 06/21/2000

LEGAL OWNER OR OPERATOR: POHL ALMOND HULLING
MAILING ADDRESS: 1825 VERDUGA ROAD
HUGHSON, CA 95326

LOCATION: 1825 VERDUGA ROAD
HUGHSON, CA 95326

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE ALMOND RECEIVING AND PRECLEANING OPERATION TO REPLACE THE EXISTING LMC PRECLEANER UNIT AND CYCLONE WITH AN LMC ROCA 60 DESTONER, LMC 6010P SCREEN DECK, AND LMC MODEL 252-LP-12 BAGHOUSE, AND TO INCREASE THE DAILY PROCESSING RATE TO 600 FIELD WEIGHT TONS/DAY.

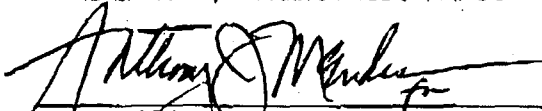
CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Visible emissions from the baghouse serving the almond receiving and precleaning operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

DAVID L. CROW, Executive Director / APCO


SEYED SAADREDIN, Director of Permit Services

Jun 21 2000 7:46AM - CRANK Joint Inspection NOT Required

Conditions for N-2110-1-1 (continued)

Page 2 of 2

8. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The quantity of almonds processed through the almond receiving and precleaning operation shall not exceed 600 field weight tons in any one day. [District Rule 2201]
10. PM10 emissions from the almond receiving and precleaning operation shall not exceed 0.0155 pounds per field weight ton. [District Rule 2201]
11. Daily records shall be maintained and shall include: (a) The date; (b) The quantity of almonds processed through the almond receiving and precleaning operation in field weight tons. [District Rule 1070]
12. All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request. [District Rule 1070]



San Joaquin Valley
Air Pollution Control District

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2110-1-2

ISSUANCE DATE: 08/30/2001

LEGAL OWNER OR OPERATOR: POHL ALMOND HULLING
MAILING ADDRESS: 1825 VERDUGA ROAD
HUGHSON, CA 95326

LOCATION: 1825 VERDUGA ROAD
HUGHSON, CA 95326

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE ALMOND RECEIVING AND PRECLEANING OPERATION TO ADD A CONDITION FOR COMPLIANCE SOURCE TESTING OF THE LMC MODEL 252-LP-12 BAGHOUSE.

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Visible emissions from the baghouse serving the almond receiving and precleaning operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

DAVID L. CROW, Executive Director / APCO


SEYED SADREDIN, Director of Permit Services

N-2110-1-2 Aug 30 2001 4:25PM - CHINA Job Inspection NOT Returned

Conditions for N-2110-1-2 (continued)

Page 2 of 2

8. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The quantity of almonds processed through the almond receiving and precleaning operation shall not exceed 600 field weight tons in any one day. [District Rule 2201]
10. PM10 emissions from the almond receiving and precleaning operation baghouse shall not exceed 0.0155 pounds per field weight ton. [District Rule 2201]
11. Daily records shall be maintained and shall include: (a) The date; (b) The quantity of almonds processed through the almond receiving and precleaning operation in field weight tons. [District Rule 1070]
12. All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request. [District Rule 1070]
13. Source testing to demonstrate compliance with the PM10 emission limitation for the almond receiving and precleaning operation baghouse shall be conducted before the end of the 2001 almond processing season. [District Rule 2301]
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
15. Source testing to measure PM10 shall be conducted using either: EPA Method 201 or 201A, and 202; or CARB Method 5 in combination with 501. [District Rule 2301]
16. In lieu of performing a source test for PM10, the results of the total particulate test may be used for compliance with the PM10 emissions limit provided the results include both the filterable and condensable (back half) particulate, and that all particulate matter is assumed to be PM10. Source testing to measure concentrations of total particulate emissions shall be conducted using EPA-method 5. [District Rule 2301]
17. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
18. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]
19. Authority to Construct permit N-2110-1-1 shall be implemented prior to the implementation of this Authority to Construct permit (N-2110-1-2). [District Rule 2201]

Appendix II
Permit to Operate N-2110-1-2



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

FILE

Permit to Operate

FACILITY: N-2110

EXPIRATION DATE: 07/31/2013

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

POHL ALMOND HULLING
1825 VERDUGA RD
HUGHSON, CA 95326

FACILITY LOCATION:

1825 VERDUGA RD
HUGHSON, CA 95326

FACILITY DESCRIPTION:

AGRICULTURAL PRODUCTS PROCESSING - ALMONDS

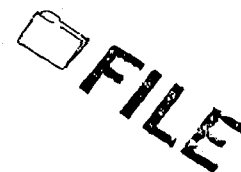
The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

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.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

San Joaquin Valley Air Pollution Control District

A large, bold, black stamp with the word "FILE" written diagonally across it, positioned in the upper right corner of the document.**PERMIT UNIT:** N-2110-1-2**EXPIRATION DATE:** 07/31/2013**EQUIPMENT DESCRIPTION:**

ALMOND RECEIVING AND PRECLEANING OPERATION CONSISTING OF AN LMC ROCA 60 DESTONER, LMC 6010P SCREEN DECK, SERVED BY AN LMC MODEL 262-LP-12 BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Visible emissions from the baghouse serving the almond receiving and precleaning operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
8. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The quantity of almonds processed through the almond receiving and precleaning operation shall not exceed 600 field weight tons in any one day. [District Rule 2201]
10. PM10 emissions from the almond receiving and precleaning operation baghouse shall not exceed 0.0155 pounds per field weight ton. [District Rule 2201]
11. Daily records shall be maintained and shall include: (a) The date; (b) The quantity of almonds processed through the almond receiving and precleaning operation in field weight tons. [District Rule 1070]
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

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

Facility Name: POHL ALMOND HULLING
Location: 1825 VERDUGA RD, HUGHSON, CA 95326
N-2110-1-2 - 07 31 2008 02:14AM - MORIOU

Appendix III
Statement of Reduction Date and Quarterly Quantity of
Almonds Received and Precleaned

Pohl & Holmes

Hulling • Shelling

1825 Verduga Rd. • Hughson, CA 95326 • (209) 883-4853

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NO. REGION

October 7, 2000

COPY

Mr. Kai Chan
San Joaquin Valley
Air Pollution Control District
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9321

Project Number: 1000509
ERC Application Numbers:
N-212-4

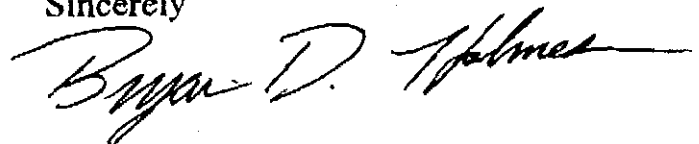
Dear Mr. Chan

In response to your letter regarding questions on the application for Emission Reduction Credits, here is the information you requested:

- 1) The date the almond receiving and precleaning operation was first operated was August 23, 2000.
- 2) The maximum daily processing prior to the new equipment was 320 tons/day.
- 3) Total tons of almonds received and precleaned from April 1998 to the end of March 2000.

	1 st	2 nd	3 rd	4 th
1998			3,993.18	7,986.37
1999			7,084.89	14,049.78

Sincerely



Bryan Holmes
Co-Owner

Appendix IV
Copy of the Source Test Results for
ATC Permit N-2110-1-2

Advanced Air Testing, LLC

Hayward, CA (510) 785-2030

Compliance Source Test Report

**Submitted To:
Pohl & Holmes
Hughson, CA**

Particulate Matter Compliance Testing Of Two Baghouses

**Test Date(s): December 10 and 11th, 2001
Submitted On: January 16th, 2002**

**Submitted By:
Advanced Air Testing, LLC
23588 Connecticut Street Bldg #1
Hayward, CA 94545
(510) 785-2030 FAX (510) 785-2039
Email: airtest@pacbell.net**

*N-2110
Source Tests*

Advanced Air Testing LLC

• Stationary Source Emission Testing • Air Pollution Testing •

23588 Connecticut Street
 Building # 1
 Hayward, California 94545-1640
 (510) 785-2030
 (510) 785-2039 Fax
 Email: airtest@pacbell.net

January 18, 2002

Pohl & Holmes
 1825 Verduga Road
 Hughson, CA 95326

Attn.: Brian Holmes

Subject: Compliance emission test report for the almond receiving and precleaning operation baghouse, and the almond hulling/shelling baghouse. Reference PTO #N-2110-1-2 and N-2110-2-2.

Test Date(s): December 10th and 11th, 2001.

Test Results: The comprehensive test results are presented in Tables 1 and 2. The table below summarizes the test results of both baghouses and their respective limits. These results show that the pre-cleaner baghouse comply with the requirements of the SJVUAPCD permit limit and that the Sheller baghouse emissions were out of compliance.

PARAMETER	Pre-Cleaner Baghouse	Sheller Baghouse	PERMIT LIMIT
Particulate, lbs/field ton	0.0081		0.0155
Particulate, lbs/meat ton		1.09	0.33

Sampling Location: The baghouses are located at the Pohl & Holmes almond hulling facility located at the address above. The samples were taken from a two test ports located on each of the baghouse exhaust vents. The sample ports on the precleaning operation baghouse were located approximately 5 diameters downstream and 1 diameter upstream of any flow disturbance, and the hulling/shelling baghouse ports were located approximately 6 diameters downstream and 1.5 diameters upstream of any flow disturbance.

Sampling Personnel: Jeff Mesloh and Burt Kusich of Advanced Air Testing, LLC.

Observing Personnel: Kai Chan of the San Joaquin Valley Unified Air Pollution Control District was present to observe the test program.

Process Description: Pohl & Holmes operates two permitted emission sources requiring abatement by baghouses. The first is the almond receiving area and pre-cleaning operation. This is the area where the almonds are initially received from the field and all foreign material such as leaves, twigs and dirt is removed. The second operation is the hulling and shelling process where the almond meat is separated from the shells.

Test Program: Three 60-minute duration tests runs were performed on the vent of each baghouse. The processes did not include any combustion sources, so the O₂ was assumed to be ambient. Product throughput for each baghouse was calculated by averaging the batch weights of the raw product from the field for the receiving area / pre-cleaning operation and the average batch weights of almond meat for the emissions calculations of the sheller baghouse.

Test QA/QC includes performing leak checks of the sampling system to the end of the sampling nozzle, both before and after the test run, leak checking the Pitot tubes and checking for cyclonic flows in the duct before starting the test.

Sampling Methods: The following Source Test Methods of the EPA or California Air Resources Board (CARB) were used:

EPA Method 5

Particulate Matter Determination

EPA Method 202A

Back-Half Condensables Determination

Instrumentation: The following field test equipment was used:

Lear-Sieglar Model LS-100 Method 5 Module

HP 42s Scientific Calculator with BASIC Isokinetic Program

K-Type Thermocouple with Beckman Industrial HD 110T Readout

Advanced Air Testing EPA M-5 Umbilical, Probes, and Impinger Set

Gelman 90mm Filters and Pyrex Holders

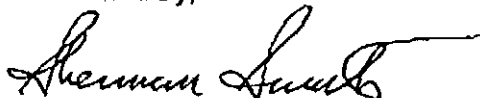
Air-guide Compensated Barometer

Comments: Calculations (A), laboratory data sheets (B), field data sheets (C), equipment calibration records (D), process data (E), stack diagrams (F), sampling system diagrams (G), source test plan (H), and Permit To Operate (I) are appended to this report.

The details and results contained within this report are to the best of AAT's knowledge an authentic and accurate representation of the test program. If this report is submitted for Compliance purposes it should only be reproduced in its entirety.

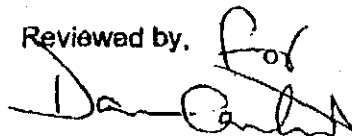
If there are any questions concerning this report, please contact Dan Cartner or me at (510) 785-2030.

Submitted by,



Sherman Smith
Operations Manager

Reviewed by,



Dan Cartner
Senior Project Manager

ADVANCED AIR TESTING, LLC

HAYWARD, CA (510) 785-2030

TABLE #1
Particulate Emissions Results
Pohl & Holmes
Precleaner Baghouse N-2110-12

RUN #	1	2	3	AVERAGE	LIMITS
TEST DATE	12-10-01	12-10-01	12-10-01		
TEST TIME	1011-1125	1438-1549	1353-1505		
PRODUCTION RATE, TPH	28.1	28.1	28.1		
SAMPLE VOLUME (DSCF)	44,542	37,472	37,951		
ISOKINETIC (%)	93.9	100.9	99.4	98.1	
DUCT TEMPERATURE (°F)	56.0	57.1	51.2	54.8	
VELOCITY (ft/sec)	40.4	40.3	40.9	40.5	
FLOW RATE (ACFM)	25,583	25,544	25,917	25,681	
FLOW RATE (DSCFM)	25,110	24,990	25,712	25,271	
H ₂ O (volume %)	0.6	0.7	0.5	0.6	
O ₂ (volume %)	20.9	20.9	20.9	20.9	
CO ₂ (volume %)	0.04	0.04	0.04	0.04	
F.H. Particulate Conc. (gr/DSCF)	0.0009	0.0008	0.0002	0.0006	
F.H. Particulate Emissions (Lbs/hr)	0.19	0.18	0.04	0.14	
Organic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Organic Particulate Emissions (Lbs/hr)	0.04	0.04	0.04	0.04	
Inorganic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Inorganic Particulate Emissions (Lbs/hr)	0.0447	0.0529	0.0448	0.0475	
Tot. Particulate Conc. (gr/DSCF)	0.0013	0.0013	0.0006	0.0011	
Tot. Particulate Emissions (Lbs/hr)	0.28	0.27	0.13	0.23	
Emission Factor, lbs/field ton	0.0098	0.0097	0.0048	0.0081	0.0155

WHERE

DSCF = Sample Volume in Dry Standard Cubic Feet

DSCFM = Dry Standard Cubic Feet per Minute

ACFM = Actual Cubic Feet per Minute

H₂O, volume % = Stack gas percent water vapor

gr/DSCF = Particulate concentration in grains per DSCF

F.H. Particulate = Filterable Particulates

Organic Particulate = Condensable Organic Particulate (solvent extract)

- Inorganic Particulate = Condensable (inorganic Particulate (Acids & Sulfates))

CALCULATIONS

Lbs/hr Emission Rate = 0.00857 * gr/DSCF * DSCFM

Correction to 12% CO₂ = gr/DSCF * 12 / CO₂%

ADVANCED AIR TESTING, LLC

HAYWARD, CA (510) 785-2030

TABLE #2

Particulate Emissions Results

Pohl & Holmes
Sheller Baghouse #2 N-2110-2-2

RUN #	1	2	3	AVERAGE	LIMITS
TEST DATE	12-10-01	12-10-01	12-10-01		
TEST TIME	1011-1125	1216-1330	1353-1505		
PRODUCTION RATE, TPH	2.16	2.16	2.16		
SAMPLE VOLUME (DSCF)	43,634	44,526	44,379		
ISOKINETIC (%)	99.9	97.9	99.4	99.0	
DUCT TEMPERATURE (°F)	46.8	52.6	54.1	51.2	
VELOCITY (ft/sec)	46.4	49.0	48.0	47.8	
FLOW RATE (ACFM)	54,703	57,741	56,592	56,345	
FLOW RATE (DSCFM)	54,666	56,936	55,871	55,824	
H ₂ O (volume %)	0.4	0.6	0.2	0.4	
O ₂ (volume %)	20.9	20.9	20.9	20.9	
CO ₂ (volume %)	0.04	0.04	0.04	0.04	
F.H. Particulate Conc. (gr/DSCF)	0.0004	0.0002	0.0003	0.0003	
F.H. Particulate Emissions (Lbs/hr)	0.21	0.10	0.15	0.16	
Organic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Organic Particulate Emissions (Lbs/hr)	0.08	0.08	0.12	0.09	
Inorganic Particulate Conc. (gr/DSCF)	0.0045	0.0013	0.0075	0.0044	
Inorganic Particulate Emissions (Lbs/hr)	2.12	0.63	3.58	2.11	
Tot. Particulate Conc. (gr/DSCF)	0.0052	0.0017	0.0080	0.0050	
Tot. Particulate Emissions (Lbs/hr)	2.41	0.81	3.85	2.36	
Emission Factor, lbs/meat ton	1.12	0.38	1.78	1.09	0.33

WHERE

DSCF = Sample Volume in Dry Standard Cubic Feet

DSCFM = Dry Standard Cubic Feet per Minute

ACFM = Actual Cubic Feet per Minute

H₂O, volume % = Stack gas percent water vapor

gr/DSCF = Particulate concentration in grains per DSCF

F.H. Particulate = Filterable Particulates

Organic Particulate = Condensible Organic Particulate (solvent extract)

Inorganic Particulate = Condensible Inorganic Particulate (Acids & Sulfates)

CALCULATIONS

Lbs/hr Emission Rate = 0.00857 * gr/DSCF * DSCFM

Correction to 12% CO₂ = gr/DSCF * 12 / CO₂%

ERC Application Evaluation

(ERC Banking from the replacement of a Cyclone with a Baghouse)

Processing Engineer: Kai Chan

Lead Engineer: Mark Schonhoff

Date: December 28, 2001

Revised: September 22, 2008

Company Name: Pohl Almond Hulling

Mailing Address: 1825 Verduga Road
Hughson, CA 95326

Contact Name: Martin Pohl

Phone: (209) 883-4853

Project #: 1000509

Application #'s: N-212-4

Date Application Received: June 15, 2000

Date Application Deemed Complete: December 27, 2000

I. Summary:

The applicant is proposing to receive emission reduction credits (ERCs) for reductions in PM₁₀ emissions generated by replacing the existing cyclone serving the almond precleaning operation with a baghouse and the use of the baghouse to control emissions from the receiving equipment. The almond receiving and precleaning operation is operating under District Permit to Operate N-2110-1. The quantity of PM₁₀ ERCs will be:

Pollutant	Quarter 1 (lbs.)	Quarter 2 (lbs.)	Quarter 3 (lbs.)	Quarter 4 (lbs.)
PM ₁₀	0	0	4,279	8,511

II. Applicable Rules:

Rule 2301: Emission Reduction Credit Banking (Adopted September 19, 1991; Amended March 11, 1992; Amended December 17, 1992)

III. Location Of Reductions:

The facility is located at 1825 Verduga Road in Hughson, CA.

IV. Method Of Generating Reductions:

The ERC's were generated by replacing the existing cyclone serving the almond precleaning operation with a baghouse and the use of the baghouse to also control emissions from the receiving equipment. The emissions from the almond receiving equipment were previously uncontrolled.

V. ERC Calculations:

A. Assumptions and Emission Factors:

The results of all Historical Actual Emission (HAE) and Actual Emission Reduction (AER) calculations are rounded to the nearest whole number.

Assumptions:

1. Control efficiency for the proposed new baghouse will be 99% for PM₁₀.
2. The results of ARB's particle size testing at several almond hulling facilities titled "Report on Tests of Emissions from Almond Hullers in San Joaquin Valley, ARB, April 1975" will be used to determine the PM₁₀ fraction of the total particulate matter emitted from the unloading of almonds. The average PM₁₀ fraction is determined as:

$$\text{Average PM}_{10} \text{ Fraction} = 0.9 \text{ lbs. PM}_{10}/\text{lb PM}$$

Emission Factors:

1. An emission factor for almond processing from AP-42, Table 9.10.2.1-1 (1/95) for the unloading operation (uncontrolled) will be utilized to calculate the PM₁₀ emission factors before and after the installation of the new baghouse. Therefore:

$$EF_{\text{PM/Receiving/Uncontrolled}} = 0.06 \text{ lbs. PM/fwt}$$

$$\begin{aligned} EF_{1/\text{Receiving}} &= \text{Pre-Modification Emission Factor (Receiving)} \\ &= EF_{\text{PM/Receiving/Uncontrolled}} \times \text{PM}_{10} \text{ Fraction} \\ &= 0.06 \text{ lbs. PM/fwt} \times 0.9 \text{ lbs. PM}_{10}/\text{lb. PM} \\ &= 0.054 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

$$\begin{aligned} EF_{2/\text{Receiving}} &= \text{Post-Modification Emission Factor} \\ &= EF_{1/\text{Receiving}} \times (1 - \text{Baghouse Control Efficiency}) \\ &= 0.054 \text{ lbs. PM}_{10}/\text{fwt} \times (1 - 0.99) \\ &= 0.00054 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

V. ERC Calculations (Continued):

2. Emission factors for almond processing from AP-42, Table 9.10.2.1-1 (1/95) for precleaning operation served by a cyclone and precleaning operation served by a baghouse will be utilized to calculate the PM₁₀ emissions before and after the replacement of the existing cyclone with the new baghouse.

$$\begin{aligned}
 EF_{1/\text{Precleaning}} &= \text{Pre-Modification Emission Factor (Precleaning)} \\
 &= EF_{\text{PM}_{10}/\text{Precleaning Cyclone}} = 0.82 \text{ lbs. PM}_{10}/\text{fwt} \\
 EF_{2/\text{Precleaning}} &= \text{Post-Modification Emission Factor (Precleaning)} \\
 &= EF_{\text{PM}_{10}/\text{Precleaning Baghouse}} = 0.015 \text{ lbs. PM}_{10}/\text{fwt}
 \end{aligned}$$

B. Baseline Period Determination and Data:

Baseline Period Determination:

Per District rule 2201 and District Policy APR 1810 the baseline period will be the two consecutive year period immediately preceding the application for the Authority to Construct authorizing the modification that resulted in the emission reductions being required. The baseline period for this emission unit will be the eight quarter period ending with the last complete quarter prior to the completed application for the ATC authorizing the installation of the baghouse. Specifically, the baseline period will be from April 1, 1998 through March 31, 2000.

Baseline Period Data:

Field Weight Tons (fwt) of Almonds Received & Precleaned				
Year	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
1998	---	0	3,993	7,986
1999	0	0	7,085	14,050
2000	0	---	---	---
Average	0	0	5,539	11,018

C. Historical Actual Emissions:

Historical Actual Emissions (HAE) are emissions having actually occurred and are calculated using process data and recognized emission factors, per Rule 2201, Section 6.2.1 (Amended June 15, 1995). The HAE will be calculated by multiplying the average amount of almonds processed in each quarter during the baseline period, as provided by the applicant, by the pre-modification emission factor. Therefore:

V. ERC Calculations (Continued):

$$\begin{aligned} \text{HAE}_{\text{PM}_{10}} &= \text{Average Process Rate (fwt/qtr)} \times (\text{EF}_{1/\text{Receiving}} + \text{EF}_{1/\text{Precleaning}}) \\ &= \text{Average Process Rate (fwt/qtr)} \times (0.054 \text{ lbs PM}_{10}/\text{fwt} + 0.82 \text{ lbs PM}_{10}/\text{fwt}) \\ &= \text{Average Process Rate (fwt/qtr)} \times 0.874 \text{ lbs PM}_{10}/\text{fwt} \end{aligned}$$

Year	HAE _{PM10} (lbs PM ₁₀ /Qtr)			
	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
1998	---	0	3,490	6,980
1999	0	0	6,192	12,280
2000	0	---	---	---
Average	0	0	4,841	9,630

D. Actual Emission Reductions (AER):

AERs due to the installation of a control device is calculated using the following equation from District Rule 2201, Section 6.5.3 (Amended June 15, 1995):

$$\text{AER} = \text{HAE} \times \text{CE}$$

where, HAE = Historical Actual Emissions

CE = Control Efficiency of the proposed air pollution control technology

For the proposed replacement of the precleaner cyclone with a baghouse and the use of a baghouse on the receiving operation, the CE will be calculated based on the emission factors utilized to determine the pre-project actual emissions and the post-project permitted daily emission limits. Therefore:

$$\begin{aligned} \text{EF}_{1/\text{Total}} &= \text{EF}_{1/\text{Receiving/Uncontrolled}} + \text{EF}_{1/\text{Precleaning/Cyclone}} \\ &= 0.054 \text{ lbs. PM}_{10}/\text{fwt} + 0.82 \text{ lbs. PM}_{10}/\text{fwt} \\ &= 0.874 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

$$\begin{aligned} \text{EF}_{2/\text{Total}} &= \text{EF}_{2/\text{Receiving/Baghouse}} + \text{EF}_{2/\text{Precleaning/Baghouse}} \\ &= 0.00054 \text{ lbs. PM}_{10}/\text{fwt} + 0.015 \text{ lbs. PM}_{10}/\text{fwt} \\ &= 0.0155 \text{ lbs. PM}_{10}/\text{fwt} \end{aligned}$$

$$\begin{aligned} \text{CE} &= (\text{EF}_{1/\text{Total}} - \text{EF}_{2/\text{Total}}) \div \text{EF}_{1/\text{Total}} \\ &= (0.874 \text{ lbs. PM}_{10}/\text{fwt} - 0.0155 \text{ lbs. PM}_{10}/\text{fwt}) \div 0.874 \text{ lbs. PM}_{10}/\text{fwt} \\ &= 0.982 \end{aligned}$$

$$\text{AER}_{\text{PM}_{10}} = \text{HAE}_{\text{PM}_{10}} \times 0.982$$

V. ERC Calculations (Continued):

AER _{PM10}				
Quarter	1 st	2 nd	3 rd	4 th
HAE _{PM10} (lbs PM ₁₀ /qtr)	0	0	4,841	9,630
AER _{PM10} (lbs PM ₁₀ /qtr)	0	0	4,754	9,457

E. Air Quality Improvement Deduction:

According to District Rule 2201 Section 6.5 (Amended June 15, 1995), 10% of the Actual Emission Reductions (AER) shall be deducted as an air quality improvement deduction. Therefore, the Air Quality Improvement Deduction will be calculated utilizing the following formula:

$$\text{Air Quality Improvement Deduction} = \text{AER} \times 0.10$$

Air Quality Improvement Deduction				
Quarter	1 st	2 nd	3 rd	4 th
AER _{PM10} (lbs PM ₁₀ /qtr)	0	0	4,754	9,457
PM ₁₀ Deductions (lbs PM ₁₀ /qtr)	0	0	475	946

F. Increase In Permitted Emissions:

There are no IPE's associated with this project.

G. Bankable Emissions Reductions:

Bankable emission reductions are the Actual Emission Reductions (AER) minus the Air Quality Improvement Deductions:

$$\text{Bankable Emission Reductions} = \text{AER} - \text{Air Quality Improvement Deductions}$$

Bankable Emission Reductions				
Quarter	1 st	2 nd	3 rd	4 th
AER _{PM10} (lbs PM ₁₀ /qtr)	0	0	4,754	9,457
PM ₁₀ Deductions (lbs PM ₁₀ /qtr)	0	0	475	946
Bankable PM ₁₀ Emission Reductions (lbs PM ₁₀ /qtr)	0	0	4,279	8,511

VI. Compliance:

A. Real Reductions:

The emission reductions were generated by the removal and replacement of the cyclone serving the precleaner with a baghouse and the use of the baghouse to also control emissions from the receiving equipment. If the modifications had not been done the emissions could have otherwise occurred. On December 10, 2001 a source test was conducted at the facility on the baghouse serving the precleaner and receiving equipment. The results of the source test indicated a maximum PM₁₀ emission rate of 0.0098 lb-PM₁₀/fwt, which verified compliance with the proposed PM₁₀ emissions limit of 0.0155 lb-PM₁₀/fwt. The District is satisfied that emissions in the amounts calculated did indeed occur. Therefore, the emission reductions are real.

B. Enforceable Reductions:

The reductions occurred as a result of the installation of the baghouse. The presence of the baghouse is required by permit conditions and can be verified during a site inspection. The resulting lower PM₁₀ emission limits are required by the conditions on the Permit to Operate and compliance with the limit was verified by a source test conducted at the facility on December 10, 2001. In addition, the PM₁₀ emission limit is a performance based limitation in pounds per field weight ton of almonds received and precleaned. The Permit to Operate and subsequent Permits to Operate for this almond receiving and precleaning operation will maintain the performance based limitation for PM₁₀. The conditions will include language stating that this condition is to enforce emission reductions of this project. This addition will ensure enforceability of the emission reduction credits for all future actions pertaining to this Permit to Operate. The performance based condition to enforce the PM₁₀ emission reductions from this project is as follows:

The PM₁₀ emissions from the almond receiving and precleaning operation shall not exceed 0.0155 pounds per field weight ton. This performance based limit is to enforce the PM₁₀ emission reductions granted by emission reduction credit certificate number N-212-4.

Therefore, the reductions are enforceable.

C. Quantifiable Reductions:

The reductions were calculated utilizing actual baseline period processing records provided by the applicant and District approved EPA AP42 emission factors. Therefore the reductions are quantifiable.

VI. Compliance (Continued):

D. Permanent Reductions:

The equipment description of the Permit to Operate lists a baghouse as required equipment, a PM₁₀ emission limit is present on the permit, and a source test to verify compliance with the emission limit has been performed. Therefore the reductions are permanent.

E. Surplus Reductions:

This section will contain an explanation of what actions were taken to ensure that all emission reductions during the baseline period were surplus.

1. Rules and Regulations:

District Rule 4201: Particulate Matter Concentration:

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

During the baseline period the almond receiving operation is uncontrolled and its particulate matter (PM) emissions are not vented through an exhaust stack. Only the PM emissions from the almond precleaner were vented through a cyclone.

Precleaner Cyclone:

PM Emission Factor: 0.95 lb/Field Weight Ton (fwt) (From AP-42, Table 9.10.2.1-1 for a precleaning cyclone - Updated 1/95)
Throughput: 320 fwt/day (Per applicant from Appendix II)
Max. Operating Hours: 24 hr/day (1,440 min/day)
Cyclone Exhaust Flow: 20,000 cfm⁽¹⁾ (From Project #N-1000330)

$$\begin{aligned} \text{PM Concentration} &= (320 \text{ fwt/day} \times 0.95 \text{ lb/fwt} \times 7,000 \text{ grains/lb.}) \\ &\div (20,000 \text{ cfm} \times 1,440 \text{ min/day}) \\ &= 0.074 \text{ grains/scf} \end{aligned}$$

Since the PM concentration is less than the allowable particulate matter concentration of this rule, the almond precleaning equipment operated in compliance with this rule during the baseline period.

¹ The almond receiving and precleaning operation was originally permitted by the Stanislaus County Air Pollution Control District in 1979. At that time the applicant did not provide the exhaust flow rate of the cyclone serving the precleaner. Therefore, an airflow of 20,000 cfm provided under project # N-1000330 for the airflow requirement of the replacement precleaner will be used to determine compliance with this rule.

VI. Compliance (Continued):

District Rule 4202: Particulate Matter – Emission Rate:

This rule limits the particulate matter (PM) emission rate from any source operation to the result of the following equation:

$$E_{\text{Max.}} = 3.59 P^{0.62}$$

where: E = Emissions in lb/hr

P = Process weight in ton/hr ($P \leq 30$ tons/hr)

Almond Receiving:

PM Emission Factor: 0.06 lb/fwt (From AP-42, Table 9.10.2.1-1 for Unloading - Updated 1/95)

Throughput: 320 fwt/day (Per applicant from Appendix II)

Max. Operating Hours: 24 hr/day

$$P = 320 \text{ fwt/day} \times 24 \text{ hr/day} = 13.33 \text{ fwt/hr}$$

$$E_{\text{Max}} = 3.59 \times (13.33)^{0.62} = 17.9 \text{ lb/hr}$$

$$E_{\text{Potential}} = 13.33 \text{ fwt/hr} \times 0.06 \text{ lb-TSP/fwt} = 0.8 \text{ lb-TSP/hr}$$

Since the potential PM Emission rate is less than the allowable maximum emission rate, the almond receiving equipment operated in compliance with this rule during the baseline period.

Almond Precleaning:

PM Emission Factor: 0.95 lb/fwt (From AP-42, Table 9.10.2.1-1 for a precleaning cyclone - Updated 1/95)

Throughput: 320 fwt/day (Per applicant from Appendix II)

Max. Operating Hours: 24 hr/day

$$P = 320 \text{ fwt/day} \times 24 \text{ hr/day} = 13.33 \text{ fwt/hr}$$

$$E_{\text{Max}} = 3.59 \times (13.33)^{0.62} = 17.9 \text{ lb/hr}$$

$$E_{\text{Potential}} = 13.33 \text{ fwt/hr} \times 0.95 \text{ lb-TSP/fwt} = 12.7 \text{ lb-TSP/hr}$$

Since the potential PM Emission rate is less than the allowable maximum emission rate, the almond precleaning equipment operated in compliance with this rule during the baseline period.

VI. Compliance (Continued):

2. Permitted Emission Limitations:

The almond receiving and precleaning permit did not contain any daily emission limits (or emission factor and process rates) during the baseline period. Daily emission limits were placed on the permit when the facility proposed to replace the existing cyclone with a baghouse under Authority to Construct (ATC) permits N-2110-1-1 and N-2110-1-2. All reductions during the baseline period are considered surplus.

3. Summary:

The almond receiving and precleaning equipment were found to be in compliance with all applicable Rules and Regulations, so no further adjustments were necessary. The emission reductions were made voluntarily and were not required by any present or pending regulation. Therefore, the emission reductions from the almond receiving and precleaning equipment are surplus.

F. Timeliness:

The date of the reductions was August 23, 2000, which was the date that the baghouse was installed and operated under normal conditions. The ERC application date was June 15, 2000. The applicant submitted the ERC application prior to the date of the reductions, which is shorter than the 180 days allowed by District rule 2301 Section 4.2.3. Therefore, the application was submitted in a timely manner.

VII. Recommendation:

Issue an Emission Reduction Credit Certificate to Pohl Almond Hulling for PM₁₀ in the following amounts:

Emission Reduction Credits				
Quarter	1 st	2 nd	3 rd	4 th
PM ₁₀ (lbs PM ₁₀ /qtr)	0	0	4,279	8,511

Appendix I: Copies of Authority to Construct Permits N-2110-1-1 & N-2110-1-2

Appendix II: Copy of Permit to Operate N-2110-1-2

Appendix III: Statement of Reduction Date and Quarterly Quantity of Almonds Received and Precleaned

Appendix VI: Copy of the Source Test Results for ATC Permit N-2110-1-2

Appendix I
ATC Permits N-2110-1-1 and N-2110-1-2



San Joaquin Valley
Air Pollution Control District

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2110-1-1

ISSUANCE DATE: 06/21/2000

LEGAL OWNER OR OPERATOR: POHL ALMOND HULLING
MAILING ADDRESS: 1825 VERDUGA ROAD
HUGHSON, CA 95326

LOCATION: 1825 VERDUGA ROAD
HUGHSON, CA 95326

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE ALMOND RECEIVING AND PRECLEANING OPERATION TO REPLACE THE EXISTING LMC PRECLEANER UNIT AND CYCLONE WITH AN LMC ROCA 60 DESTONER, LMC 6010P SCREEN DECK, AND LMC MODEL 252-LP-12 BAGHOUSE, AND TO INCREASE THE DAILY PROCESSING RATE TO 600 FIELD WEIGHT TONS/DAY.

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Visible emissions from the baghouse serving the almond receiving and precleaning operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

DAVID L. CROW, Executive Director / APCO

SEYED SADEGHIN, Director of Permit Services

Jun 21 2000 7:46AM - CHANK Joint Inspection NOT Required

8. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The quantity of almonds processed through the almond receiving and precleaning operation shall not exceed 600 field weight tons in any one day. [District Rule 2201]
10. PM10 emissions from the almond receiving and precleaning operation shall not exceed 0.0155 pounds per field weight ton. [District Rule 2201]
11. Daily records shall be maintained and shall include: (a) The date; (b) The quantity of almonds processed through the almond receiving and precleaning operation in field weight tons. [District Rule 1070]
12. All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request. [District Rule 1070]



San Joaquin Valley
Air Pollution Control District

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2110-1-2

ISSUANCE DATE: 08/30/2001

LEGAL OWNER OR OPERATOR: POHL ALMOND HULLING
MAILING ADDRESS: 1825 VERDUGA ROAD
HUGHSON, CA 95326

LOCATION: 1825 VERDUGA ROAD
HUGHSON, CA 95326

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE ALMOND RECEIVING AND PRECLEANING OPERATION TO ADD A CONDITION FOR COMPLIANCE SOURCE TESTING OF THE LMC MODEL 252-LP-12 BAGHOUSE.


CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Visible emissions from the baghouse serving the almond receiving and precleaning operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

DAVID L. CROW, Executive Director / APCO


SEYED SADREDIN, Director of Permit Services

N-2110-1-2 Aug 30 2001 4:25PM - CHANK Joint Inspection NOT Required

8. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The quantity of almonds processed through the almond receiving and precleaning operation shall not exceed 600 field weight tons in any one day. [District Rule 2201]
10. PM10 emissions from the almond receiving and precleaning operation baghouse shall not exceed 0.0155 pounds per field weight ton. [District Rule 2201]
11. Daily records shall be maintained and shall include: (a) The date; (b) The quantity of almonds processed through the almond receiving and precleaning operation in field weight tons. [District Rule 1070]
12. All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request. [District Rule 1070]
13. **Source testing to demonstrate compliance with the PM10 emission limitation for the almond receiving and precleaning operation baghouse shall be conducted before the end of the 2001 almond processing season.** [District Rule 2301]
14. **Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing.** [District Rule 1081]
15. Source testing to measure PM10 shall be conducted using either: EPA Method 201 or 201A, and 202; or CARB Method 5 in combination with 501. [District Rule 2301]
16. In lieu of performing a source test for PM10, the results of the total particulate test may be used for compliance with the PM10 emissions limit provided the results include both the filterable and condensable (back half) particulate, and that all particulate matter is assumed to be PM10. Source testing to measure concentrations of total particulate emissions shall be conducted using EPA-method 5. [District Rule 2301]
17. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
18. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]
19. Authority to Construct permit N-2110-1-1 shall be implemented prior to the implementation of this Authority to Construct permit (N-2110-1-2). [District Rule 2201]

Appendix II
Permit to Operate N-2110-1-2



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

FILE

Permit to Operate

FACILITY: N-2110

EXPIRATION DATE: 07/31/2013

LEGAL OWNER OR OPERATOR: POHL ALMOND HULLING
MAILING ADDRESS: 1825 VERDUGA RD
HUGHSON, CA 95326

FACILITY LOCATION: 1825 VERDUGA RD
HUGHSON, CA 95326

FACILITY DESCRIPTION: AGRICULTURAL PRODUCTS PROCESSING - ALMONDS


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.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

San Joaquin Valley Air Pollution Control District

 **FILE**

PERMIT UNIT: N-2110-1-2

EXPIRATION DATE: 07/31/2013

EQUIPMENT DESCRIPTION:

ALMOND RECEIVING AND PRECLEANING OPERATION CONSISTING OF AN LMC ROCA 60 DESTONER, LMC 6010P SCREEN DECK, SERVED BY AN LMC MODEL 252-LP-12 BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Visible emissions from the baghouse serving the almond receiving and precleaning operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201]
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
8. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. The quantity of almonds processed through the almond receiving and precleaning operation shall not exceed 600 field weight tons in any one day. [District Rule 2201]
10. PM10 emissions from the almond receiving and precleaning operation baghouse shall not exceed 0.0155 pounds per field weight ton. [District Rule 2201]
11. Daily records shall be maintained and shall include: (a) The date; (b) The quantity of almonds processed through the almond receiving and precleaning operation in field weight tons. [District Rule 1070]
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

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

Appendix III
Statement of Reduction Date and Quarterly Quantity of
Almonds Received and Precleaned

Pohl & Holmes

Hulling • Shelling

1825 Verduga Rd. • Hughson, CA 95326 • (209) 883-4853

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OCT 10 2000

SAN JOAQUIN VALLEY
UNIFIED A.P.C.D.
NO. REGION

October 7, 2000

COPY

Mr. Kai Chan
San Joaquin Valley
Air Pollution Control District
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9321

Project Number: 1000509
ERC Application Numbers:
N-212-4

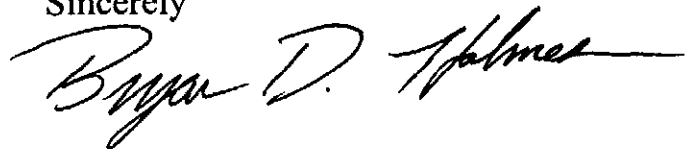
Dear Mr. Chan

In response to your letter regarding questions on the application for Emission Reduction Credits, here is the information you requested:

- 1) The date the almond receiving and precleaning operation was first operated was August 23, 2000.
- 2) The maximum daily processing prior to the new equipment was 320 tons/day.
- 3) Total tons of almonds received and precleaned from April 1998 to the end of March 2000.

	1 st	2 nd	3 rd	4 th
1998			3,993.18	7,986.37
1999			7,084.89	14,049.78

Sincerely



Bryan Holmes
Co-Owner

Appendix IV
Copy of the Source Test Results for
ATC Permit N-2110-1-2

Compliance Source Test Report

**Submitted To:
Pohl & Holmes
Hughson, CA**

**Particulate Matter Compliance Testing
Of Two Baghouses**

**Test Date(s): December 10 and 11th, 2001
Submitted On: January 16th, 2002**

**Submitted By:
Advanced Air Testing, LLC
23588 Connecticut Street Bldg #1
Hayward, CA 94545
(510) 785-2030 FAX (510) 785-2039
Email: airtest@pacbell.net**

N-2110
Source Tests

Advanced Air Testing LLC

• Stationary Source Emission Testing • Air Pollution Testing •

23588 Connecticut Street
Building # 1
Hayward, California 94545-1640
(510) 785-2030
(510) 785-2039 Fax
Email: airtest@pacbell.net

January 18, 2002

Pohl & Holmes
1825 Verduga Road
Hughson, CA 95326

Attn.: Brian Holmes

Subject: Compliance emission test report for the almond receiving and precleaning operation baghouse, and the almond hulling/shelling baghouse. Reference PTO #N-2110-1-2 and N-2110-2-2.

Test Date(s): December 10th and 11th, 2001.

Test Results: The comprehensive test results are presented in Tables 1 and 2. The table below summarizes the test results of both baghouses and their respective limits. These results show that the pre-cleaner baghouse comply with the requirements of the SJVUAPCD permit limit and that the Sheller baghouse emissions were out of compliance.

PARAMETER	Pre-Cleaner Baghouse	Sheller Baghouse	PERMIT LIMIT
Particulate, lbs/field ton	0.0081		0.0155
Particulate, lbs/meat ton		1.09	0.33

Sampling Location: The baghouses are located at the Pohl & Holmes almond hulling facility located at the address above. The samples were taken from a two test ports located on each of the baghouse exhaust vents. The sample ports on the precleaning operation baghouse were located approximately 5 diameters downstream and 1 diameter upstream of any flow disturbance, and the hulling/shelling baghouse ports were located approximately 6 diameters downstream and 1.5 diameters upstream of any flow disturbance.

Sampling Personnel: Jeff Mesloh and Burt Kusich of Advanced Air Testing, LLC.

Observing Personnel: Kai Chan of the San Joaquin Valley Unified Air Pollution Control District was present to observe the test program.

Process Description: Pohl & Holmes operates two permitted emission sources requiring abatement by baghouses. The first is the almond receiving area and pre-cleaning operation. This is the area where the almonds are initially received from the field and all foreign material such as leaves, twigs and dirt is removed. The second operation is the hulling and shelling process where the almond meat is separated from the shells.

Test Program: Three 60-minute duration tests runs were performed on the vent of each baghouse. The processes did not include any combustion sources, so the O₂ was assumed to be ambient. Product throughput for each baghouse was calculated by averaging the batch weights of the raw product from the field for the receiving area / pre-cleaning operation and the average batch weights of almond meat for the emissions calculations of the sheller baghouse.

Test QA/QC includes performing leak checks of the sampling system to the end of the sampling nozzle, both before and after the test run, leak checking the Pitot tubes and checking for cyclonic flows in the duct before starting the test.

Sampling Methods: The following Source Test Methods of the EPA or California Air Resources Board (CARB) were used:

EPA Method 5	Particulate Matter Determination
EPA Method 202A	Back-Half Condensables Determination

Instrumentation: The following field test equipment was used:

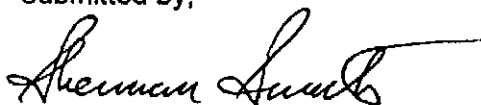
Lear-Siegler Model LS-100 Method 5 Module
HP 42s Scientific Calculator with BASIC Isokinetic Program
K-Type Thermocouple with Beckman Industrial HD 110T Readout
Advanced Air Testing EPA M-5 Umbilical, Probes, and Impinger Set
Gelman 90mm Filters and Pyrex Holders
Air-guide Compensated Barometer

Comments: Calculations (A), laboratory data sheets (B), field data sheets (C), equipment calibration records (D), process data (E), stack diagrams (F), sampling system diagrams (G), source test plan (H), and Permit To Operate (I) are appended to this report.

The details and results contained within this report are to the best of AAT's knowledge an authentic and accurate representation of the test program. If this report is submitted for Compliance purposes it should only be reproduced in its entirety.

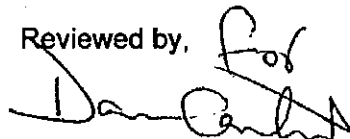
If there are any questions concerning this report, please contact Dan Cartner or me at (510) 785-2030.

Submitted by,



Sherman Smith
Operations Manager

Reviewed by,



Dan Cartner
Senior Project Manager

TABLE #1
Particulate Emissions Results

Pohl & Holmes
Precleaner Baghouse N-210-12

RUN #	1	2	3	AVERAGE	LIMITS
TEST DATE	12-10-01	12-10-01	12-10-01		
TEST TIME	1011-1125	1438-1549	1353-1505		
PRODUCTION RATE, TPH	28.1	28.1	28.1		
SAMPLE VOLUME (DSCF)	44,542	37,472	37,951		
ISOKINETIC (%)	93.9	100.9	99.4	98.1	
DUCT TEMPERATURE (°F)	56.0	57.1	51.2	54.8	
VELOCITY (ft/sec)	40.4	40.3	40.9	40.5	
FLOW RATE (ACFM)	25,583	25,544	25,917	25,681	
FLOW RATE (DSCFM)	25,110	24,990	25,712	25,271	
H ₂ O (volume %)	0.6	0.7	0.5	0.6	
O ₂ (volume %)	20.9	20.9	20.9	20.9	
CO ₂ (volume %)	0.04	0.04	0.04	0.04	
F.H. Particulate Conc. (gr/DSCF)	0.0009	0.0008	0.0002	0.0006	
F.H. Particulate Emissions (Lbs/hr)	0.19	0.18	0.04	0.14	
Organic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Organic Particulate Emissions (Lbs/hr)	0.04	0.04	0.04	0.04	
Inorganic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Inorganic Particulate Emissions (Lbs/hr)	0.0447	0.0529	0.0448	0.0475	
Tot. Particulate Conc. (gr/DSCF)	0.0013	0.0013	0.0006	0.0011	
Tot. Particulate Emissions (Lbs/hr)	0.28	0.27	0.13	0.23	
Emission Factor, lbs/field ton	0.0098	0.0097	0.0048	0.0081	0.0155

WHERE

DSCF = Sample Volume in Dry Standard Cubic Feet

DSCFM = Dry Standard Cubic Feet per Minute

ACFM = Actual Cubic Feet per Minute

H₂O, volume % = Stack gas percent water vapor

gr/DSCF = Particulate concentration in grains per DSCF

F.H. Particulate = Filterable Particulates

Organic Particulate = Condensible Organic Particulate (solvent extract)

- Inorganic Particulate = Condensible Inorganic Particulate (Acids & Sulfates)

CALCULATIONS

Lbs/hr Emission Rate = 0.00857 * gr/DSCF * DSCFM

Correction to 12% CO₂ = gr/DSCF * 12 / CO₂%

TABLE #2
Particulate Emissions Results

Pohl & Holmes
Sheller Baghouse #2 N-2110-2.2

RUN #	1	2	3	AVERAGE	LIMITS
TEST DATE	12-10-01	12-10-01	12-10-01		
TEST TIME	1011-1125	1216-1330	1353-1505		
PRODUCTION RATE, TPH	2.16	2.16	2.16		
SAMPLE VOLUME (DSCF)	43,634	44,526	44,379		
ISOKINETIC (%)	99.9	97.9	99.4	99.0	
DUCT TEMPERATURE (°F)	46.8	52.6	54.1	51.2	
VELOCITY (ft/sec)	46.4	49.0	48.0	47.8	
FLOW RATE (ACFM)	54,703	57,741	56,592	56,345	
FLOW RATE (DSCFM)	54,666	56,936	55,871	55,824	
H ₂ O (volume %)	0.4	0.6	0.2	0.4	
O ₂ (volume %)	20.9	20.9	20.9	20.9	
CO ₂ (volume %)	0.04	0.04	0.04	0.04	
F.H. Particulate Conc. (gr/DSCF)	0.0004	0.0002	0.0003	0.0003	
F.H. Particulate Emissions (Lbs/hr)	0.21	0.10	0.15	0.16	
Organic Particulate Conc. (gr/DSCF)	0.0002	0.0002	0.0002	0.0002	
Organic Particulate Emissions (Lbs/hr)	0.08	0.08	0.12	0.09	
Inorganic Particulate Conc. (gr/DSCF)	0.0045	0.0013	0.0075	0.0044	
Inorganic Particulate Emissions (Lbs/hr)	2.12	0.63	3.58	2.11	
Tot. Particulate Conc. (gr/DSCF)	0.0052	0.0017	0.0080	0.0050	
Tot. Particulate Emissions (Lbs/hr)	2.41	0.81	3.85	2.36	
Emission Factor, lbs/meat ton	1.12	0.38	1.78	1.09	0.33

WHERE

DSCF = Sample Volume in Dry Standard Cubic Feet

DSCFM = Dry Standard Cubic Feet per Minute

ACFM = Actual Cubic Feet per Minute

H₂O, volume % = Stack gas percent water vapor

gr/DSCF = Particulate concentration in grains per DSCF

F.H. Particulate = Filterable Particulates

Organic Particulate = Condensible Organic Particulate (solvent extract)

Inorganic Particulate = Condensible Inorganic Particulate (Acids & Sulfates)

CALCULATIONS

Lbs/hr Emission Rate = 0.00857 * gr/DSCF * DSCFM

Correction to 12% CO₂ = gr/DSCF * 12 / CO₂%

KC

**DECLARATION OF PUBLICATION
(C.C.P. S2015.5)**

**COUNTY OF STANISLAUS
STATE OF CALIFORNIA**

**NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Pohl Almond Hulling for emission reductions generated by the use of a baghouse on the almond receiving pit and the replacement of the cyclone serving the almond precleaning operation with a baghouse, at 1825 Verduga Road in Hughson, CA. The quantity of ERCs to be issued is 12,790 pounds of PM10 per calendar year.

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FINANCE
SJVAPCD

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NOV 17 2008

SJVAPCD
NORTHERN REGION

No comments were received following the District's preliminary decision on this project.

The application review for Project #N-1000509 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356-8718.
Pub Dates November 3, 2008

\$ 87.69

I am a citizen of the United States and a resident Of the County aforesaid; I am over the age of Eighteen years, and not a party to or interested In the above entitle matter. I am a printer and Principal clerk of the publisher of **THE MODESTO BEE**, printed in the City of **MODESTO**, County of **STANISLAUS**, State of California, daily, for which said newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of **STANISLAUS**, State of California, Under the date of **February 25, 1951, Action No. 46453**; that the notice of which the annexed is a printed copy, has been published in each issue there of on the following dates, to wit:

Nov 03, 2008

I certify (or declare) under penalty of perjury That the foregoing is true and correct and that This declaration was executed at

MODESTO, California on

November 3rd, 2008

(Signature)

Neema Feliza