



San Joaquin Valley
Unified Air Pollution Control District

RECEIVED

MAY 23 1996

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

May 21, 1996

Richard Mueller
A.L. Gilbert (dba: Berry Seed & Feed Company)
P.O. Box 459
Keyes, CA 95328

RE: Notice of Final Action - Emission Reduction Credit (ERC) Certificate and Authorities to Construct/ Project #s: 950107 & 950108

Dear Mr. Mueller:

The Air Pollution Control Officer has issued Authorities to Construct for the installation of grain processing equipment and an Emission Reduction Credit Certificate N-104-4 resulting from the installation of PM10 control equipment to the A.L. Gilbert Company (dba: Berry Seed and Feed) located at 4431 Jessup Road in Keyes.

Enclosed are copies of the Authorities to Construct, the original ERC certificate, and a copy of the Notice of Final Action to be published approximately three days from the date of this letter.

All relevant comments received within the 30-day public comment period have been addressed and incorporated into the application review.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Anthony Mendes, Permit Services Manager - Northern Region, at (209) 545-7000.

Sincerely,

Seyed Sadredin
Director of Permit Services

CV:ad

Enclosures

Certified Mail #Z198 113 802

cc: Anthony Mendes, Permit Services Manager - Northern Region

David L. Crow

Executive Director/ Air Pollution Control Officer

1999 Tuolumne Street, Suite 200 Fresno, CA 93721 • (209) 497-1000 • FAX (209) 233-2057

Northern Region

4230 Kiernan Avenue, Suite 130 • Modesto, CA 95356
(209) 545-7000 • FAX (209) 545-8652

Central Region

1999 Tuolumne Street, Suite 200 • Fresno, CA 93721
(209) 497-1000 • FAX (209) 233-2057

Southern Region

2700 M Street, Suite 275 • Bakersfield, CA 93301
(805) 862-5200 • FAX (805) 862-5201



San Joaquin Valley
Unified Air Pollution Control District

May 21, 1996

Mr. Raymond Menebroker, 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 Credit (ERC) Certificate and Authorities to Construct
Project #s: 950107 & 950108

Dear Mr. Menebroker:

The Air Pollution Control Officer has issued Authorities to Construct for the installation of grain processing equipment and ERCs resulting from the installation of PM10 control equipment to the A.L. Gilbert Company (dba: Berry Seed and Feed) located at 4431 Jessup Road in Keyes.

Enclosed are copies of the Authorities to Construct, the ERC certificate, and the Notice of Final Action to be published approximately three days from the date of this letter.

All comments received following the District's preliminary decision were addressed. All relevant comments were incorporated into the application reviews.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Anthony Mendes, Permit Services Manager - Northern Region, at (209) 545-7000.

Sincerely,

Seyed Sadredin
Director of Permit Services

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Enclosures

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David L. Crow

Executive Director/ Air Pollution Control Officer

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Northern Region

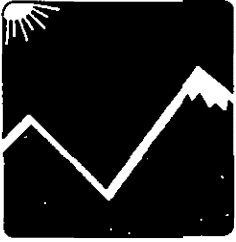
4230 Kiernan Avenue, Suite 130 • Modesto, CA 95356
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Southern Region

2700 M Street, Suite 275 • Bakersfield, CA 93301
(805) 362-5200 • FAX (805) 362-5201



San Joaquin Valley
Unified Air Pollution Control District

May 21, 1996

Ken Bigos, Chief
New Source Section
US EPA - Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

RE: Notice of Final Action - Emission Reduction Credit (ERC) Certificate and Authorities to Construct
Project #s: 950107 & 950108

Dear Mr. Bigos:

The Air Pollution Control Officer has issued Authorities to Construct for the installation of grain processing equipment and ERCs resulting from the installation of PM10 control equipment to the A.L. Gilbert Company (dba: Berry Seed and Feed) located at 4431 Jessup Road in Keyes.

Enclosed are copies of the Authorities to Construct, the ERC certificate, and the Notice of Final Action to be published approximately three days from the date of this letter.

All comments received following the District's preliminary decision were addressed. All relevant comments were incorporated into the application reviews.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Anthony Mendes, Permit Services Manager - Northern Region, at (209) 545-7000.

Sincerely,

Seyed Sadredin
Director of Permit Services

CV:ad

Enclosures

cc: Anthony Mendes, Permit Services Manager - Northern Region

David L. Crow

Executive Director/ Air Pollution Control Officer

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San Joaquin Valley
Unified Air Pollution Control District
AUTHORITY TO CONSTRUCT

PERMIT NO: N-1758-15-4

ISSUANCE DATE: 04/15/96

LEGAL OWNER OR OPERATOR: BERRY SEED & FEED COMPANY
MAILING ADDRESS: P.O. BOX 459
KEYES, CA 95328

LOCATION: 4431 JESSUP RD., KEYES

EQUIPMENT DESCRIPTION:
INCREASE THE MAXIMUM AMOUNT OF MATERIAL RECEIVED TO 4,000 TONS PER DAY

CONDITIONS

1. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location.
2. 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.
3. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere.
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is dark or darker than Ringelmann 1 or equivalent to 20% opacity.
5. There shall be no visible emissions from the baghouse and associated ducting.
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency.
7. No air contaminant shall be released into the atmosphere which causes a public nuisance.

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) 545-7000 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


SETED SADREDIN, DIRECTOR OF PERMIT SERVICES

Northern Regional Office *4230 Kiernan Ave., Suite 130 *Modesto, California 95356 *(209) 545-7000* FAX (209) 545-8652

1796-4-15 - CHECK BY AGENT INSPECTION REQUIRED

8. All transfer points and the rail receiving pit shall be enclosed.
9. The maximum quantity of grain received shall not exceed 4,000 tons during any single day.
10. The PM10 emissions from receiving shall not exceed $1.7E-03$ lbs per ton of material received. This performance based limit is to enforce the PM10 emission reductions granted by certificate N-104-4.
11. The PM10 emissions from transferring material to storage shall not exceed $4.4E-03$ lbs per ton of material received. This performance based limit is to enforce the PM10 emission reductions granted by certificate N-104-4.
12. A log of daily amount of grain received shall be kept on the premises and shall be made available for District inspection upon request.
13. Prior to implementation of this Authority to Construct, the PM10 emissions shall be mitigated in accordance with the requirements of District Rule 2201: New and Modified Stationary Source Review.



San Joaquin Valley
Unified Air Pollution Control District
AUTHORITY TO CONSTRUCT

PERMIT NO: N-1758-26-0

ISSUANCE DATE: 04/15/96

LEGAL OWNER OR OPERATOR: BERRY SEED & FEED COMPANY
MAILING ADDRESS: P.O. BOX 459
KEYES, CA 95328

LOCATION: 4431 JESSUP RD., KEYES

EQUIPMENT DESCRIPTION:

GRAIN CLEANING SYSTEM INCLUDING: TWO 250 TON MILL GRAIN STORAGE BINS SERVED BY BIN VENT FILTERS;
ONE ROTEX MODEL 523 GC 20 TON/HR GRAIN CLEANER SERVED BY A P&F JT 6-42-355 BAGHOUSE; TWO 50 TON
CLEAN GRAIN STORAGE BINS SERVED BY BIN VENT FILTERS

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance.
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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.
3. 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.
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.
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere.
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency.
7. There shall be no visible emissions from the dust control system.

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) 545-7000 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 SADREHIN, DIRECTOR OF PERMIT SERVICES

Northern Regional Office *4230 Kiernan Ave., Suite 130 *Modesto, California 95356 *(209) 545-7000* FAX (209) 545-8652

1986-15 - CERVIS JOINT INSPECTION REQUIREMENT

8. No more than 1,440 tons of grain shall be processed by the grain cleaning system in any one day.
9. The PM10 emissions from the grain cleaning system shall not exceed 1.27e-02 pounds per ton of grain processed.
10. A daily record of the amount of grain processed shall be maintained on the premises at all times.
11. All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request.
12. Prior to implementation of this Authority to Construct, the PM10 emissions shall be mitigated in accordance with the requirements of District Rule 2201: New and Modified Stationary Source Review.



San Joaquin Valley
Unified Air Pollution Control District
AUTHORITY TO CONSTRUCT

PERMIT NO: N-1758-27-0

ISSUANCE DATE: 04/15/96

LEGAL OWNER OR OPERATOR: BERRY SEED & FEED COMPANY
MAILING ADDRESS: P.O. BOX 459
KEYES, CA 95328

LOCATION: 4431 JESSUP RD., KEYES

EQUIPMENT DESCRIPTION:

ROLLER MILLING SYSTEM INCLUDING: THREE STEAM CONDITIONING CHAMBERS; THREE FERREL-ROSS 20 TON/HR FLAKING MILLS; ONE AIR LIFT SYSTEM SERVED BY ONE 1D3D CYCLONE; ONE GRAIN COOLER SERVED BY ONE 1D3D CYCLONE

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance.
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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.
3. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere.
4. No more than a total of 1,440 tons of grain shall be processed by the grain rolling system in any one day.
5. The PM10 emissions from the grain rolling system shall not exceed 8.0e-03 pounds per ton of grain processed.
6. A daily record of the amount of grain processed shall be maintained on the premises at all times.
7. All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request.

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) 545-7000 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 SABREDIN, DIRECTOR OF PERMIT SERVICES

Northern Regional Office *4230 Kiernan Ave., Suite 130 *Modesto, California 95356 *(209) 545-7000* FAX (209) 545-8652

1984 U.S. GOVERNMENT PRINTING OFFICE: 1983 O-312-100

8. Prior to implementation of this Authority to Construct, the PM10 emissions shall be mitigated in accordance with the requirements of District Rule 2201: New and Modified Stationary Source Review.



San Joaquin Valley
Unified Air Pollution Control District
AUTHORITY TO CONSTRUCT

PERMIT NO: N-1758-28-0

ISSUANCE DATE: 04.15.96

LEGAL OWNER OR OPERATOR: BERRY SEED & FEED COMPANY
MAILING ADDRESS: P.O. BOX 459
KEYES, CA 95328

LOCATION: 4431 JESSUP RD., KEYES

EQUIPMENT DESCRIPTION:

GRAIN GRINDING SYSTEM INCLUDING: ONE MAGNUM 20X44 24 TON/HR GRAIN GRINDER SERVED BY A P&F JT 6-42-355 BAGHOUSE; GRINDING MATERIAL STORAGE (100 TONS) SERVED BY BIN VENT FILTERS; GROUND MATERIAL STORAGE (100 TONS) SERVED BY BIN VENT FILTERS

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance.
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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.
3. 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.
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.
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere.
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency.
7. There shall be no visible emissions from the dust control system.

CONDITIONS CONTINUE ON NEXT PAGE

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DAVID L. CROW, EXECUTIVE DIRECTOR/APCO


SEYED SADREJIN, DIRECTOR OF PERMIT SERVICES

Northern Regional Office *4230 Kiernan Ave., Suite 130 *Modesto, California 95356 *(209) 545-7000* FAX (209) 545-8652

1996-13 - CDDM - AGENCY INSPECTION REQUIRED

8. No more than 576 tons of grain shall be processed by the grain grinding system in any one day.
9. The PM10 emissions from the grain grinding system shall not exceed 6.7e-03 pounds per ton of grain processed.
10. A daily record of the amount of grain processed shall be maintained on the premises at all times.
11. All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request.
12. Prior to implementation of this Authority to Construct, the PM10 emissions shall be mitigated in accordance with the requirements of District Rule 2201: New and Modified Stationary Source Review.



San Joaquin Valley
Unified Air Pollution Control District

Northern Regional Office * 4230 Kiernan Ave., Suite 130 * Modesto, CA 95356

Emission Reduction Credit Certificate
N-104-4

Issued To: **Berry Seed & Feed**
Issue Date: **May 21, 1996**

Location of Reduction: **4431 Jessup Road**
Keyes, CA

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
19,353 lbs	17,086 lbs	18,646 lbs	20,750 lbs

Conditions Attached

Method Of Reduction

Shutdown of Entire Stationary Source

Shutdown of Emissions Unit

Other: Addition of control equipment to an existing receiving pit and conveying system

David L. Crow, APCO

Seyed Sadredin
Director of Permit Services

5/21/94
Date

The Modesto Bee

**NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF AN
EMISSION REDUCTION CREDIT CERTIFICATE AND
AUTHORITIES TO CONSTRUCT**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued an emission reduction credit certificate to the A.L. Gilbert Company (dba: Berry Seed and Feed) for the installation of PM10 control equipment and Authorities to Construct for the installation of grain processing equipment.

All comments received for Project #s 950107 & 950108 following the District's preliminary decision were addressed. All relevant comments were incorporated into the Application Reviews, which are available for public inspection at the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, NORTHERN REGION OFFICE, 4230 KIERNAN AVE., SUITE 130, MODESTO, CA 95356 (209) 545-7000.**

ERC APPLICATION EVALUATION

Processing Engineer: C. Valverde

Date: 12 February 1996

Facility Name: A.L. Gilbert (Berry Seed & Feed Company)
Mailing Address: P.O. Box 459
Keyes, CA 95328

Contact Name: Richard Mueller
Phone: (209) 537-0766

Project Number: 950107
Certificate Number: N-104-4

Date Application Received: 01 March 1995
Date Application Deemed Complete: 07 April 1995

I. SUMMARY

A.L. Gilbert is applying for emission reduction credits (ERC's) for a reduction in emissions which occurred as a result of the installation of PM10 control equipment to control emissions from a rail car receiving pit and from the equipment that transfers grain from the pit to storage. The installation of the equipment to control emissions from transferring grain to storage was authorized by Authority to Construct (A/C) N-1758-15-1. The installation of the equipment to control emissions from receiving grain to storage was authorized by A/C N-1758-15-2.

A portion of the actual emission reductions (AER's) will be used to offset the entire stationary source NSR balance for PM10 as determined in the review of applications N-1758-26-0, 27-0, 28-0, & 15-4. Pending a determination of compliance with District Rule 2301: Emission Reduction Credit Banking and public notification, an ERC certificate will be issued to A.L. Gilbert Company for all reductions in excess of those required to offset the NSR balance for PM10. The certificate will reflect the following amount of emission reductions:

EMISSION REDUCTION CREDITS (pounds)				
QUARTER	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
ERC's	19,353	17,086	18,646	20,750

II. APPLICABLE RULES

Rule 2301: Emission Reduction Credit Banking

III. LOCATION OF REDUCTIONS

4431 Jessup Road, Keyes

IV. METHOD OF GENERATING REDUCTIONS

The reduction in PM10 emissions was achieved by adding equipment to control emissions from a previously uncontrolled operation. The first operation, a rail car receiving pit was enclosed and the enclosure was ducted to a baghouse. The second operation, which includes conveying equipment to transfer grain from the receiving pit to storage, is now operated under a vacuum and the air being evacuated is ducted to two baghouses. One of the two baghouses involved is the same unit that serves the rail receiving pit enclosure.

V. CALCULATIONS

A. Assumptions and Emission Factors

1. Transfer to Storage (N-1758-15-1)

Both the uncontrolled and controlled emission factors for this operation will be taken from the review of application N-1758-15-1. They are as follows:

Uncontrolled: 0.44 lbs/ton

Controlled: 4.4e-03 lbs/ton

The uncontrolled PM10 emission factor is based on the emission factor from AP-42, Table 6.4-1 for a headhouse. The AP-42 emission factor is for total particulate matter. It is assumed that PM10 emissions are 29% of the total particulate emissions⁴.

The controlled emission factor is based on the uncontrolled emission factor and a control efficiency of 99%.

⁴ PM10 Manual, Table V-2

2. Receiving Pit (N-1758-15-2)

Both the uncontrolled and controlled emission factors for this operation will be taken from the review of application N-1758-15-2. They are as follows:

Uncontrolled: 0.17 lbs/ton

Controlled: 1.7e-03 lbs/ton

The uncontrolled PM10 emission factor is based on the emission factor from AP-42, Table 6.4-1 for grain receiving. The AP-42 emission factor is for total particulate matter. It is assumed that PM10 emissions are 29% of the total particulate emissions⁵.

The controlled emission factor is based on the uncontrolled emission factor and a control efficiency of 99%.

B. Baseline Period Determination

As per policy NSR/ERC 10-2, for reductions authorized by a previous Authority to Construct, the baseline emissions shall be selected from a period as prescribed in Rule 2201 immediately preceding the date on which the A/C authorizing the reduction was deemed complete.

A/C N-1758-15-1 was deemed complete on 28 September 1992. 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 A/C authorizing the reduction. Specifically, the baseline period will be from 1 July 1990 thru 30 June 1992.

TONS OF MATERIAL TRANSFERRED TO STORAGE (N-1758-15-1)				
YEAR	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
1990			51,043.3	49,534.1
1991	50,274.6	47,802.2	52,507.3	61,756.0
1992	55,118.8	50,162.6		
Average	52,696.7	48,982.4	51,775.3	55,645.1

A/C N-1758-15-2 was deemed complete on 15 June 1992. 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 A/C authorizing the reduction. Specifically, the baseline period will be from 1 April 1990 thru 31 March 1992.

⁵ PM10 Manual, Table V-2

YEAR	TONS OF MATERIAL RECEIVED (N-1758-15-2)			
	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
1990		48,259.8	51,043.3	49,534.1
1991	50,274.6	47,802.2	52,507.3	61,756.0
1992	55,118.8			
Average	52,696.7	48,031.0	51,775.3	55,645.1

C. Historical Actual Emissions (HAE)

The HAE from each unit will be calculated by multiplying the average amount of material processed in each quarter during the baseline period, as provided by the Applicant, by the emission factor prior to the modification (or the uncontrolled emission factor).

1. Transfer to Storage

	HAE FOR THE TRANSFER EQUIPMENT (pounds)			
	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
Average	52,696.7	48,982.4	51,775.3	55,645.1
Emission Factor			0.44 lbs/ton	
HAE (lbs)	23,187	21,552	22,781	24,484

2. Receiving Pit

	HAE FOR THE RECEIVING PIT (pounds)			
	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
Average	52,696.7	48,031.0	51,775.3	55,645.1
Emission Factor			0.17 lbs/ton	
HAE (lbs)	8,958	8,165	8,802	9,460

D. Actual Emission Reductions (AER)

The AER's will be calculated by multiplying the HAE by the change in control efficiency (ΔCE).

$$AER = HAE \times \Delta CE$$

$$\Delta CE = [(EF_1 - EF_2) / EF_1]$$

where,

$$EF_2 = \text{emission factor after modification}$$

$$EF_1 = \text{emission factor before modification}$$

1. Transfer to Storage

$$\Delta CE = [(0.44 - 4.35e-03) / 0.44]$$

$$= 0.99$$

AER FOR THE TRANSFER EQUIPMENT (pounds)				
	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
HAE	23,187	21,552	22,781	24,484
ΔCE			0.99	
AER (lbs)	22,955	21,336	22,553	24,239

2. Receiving Pit

$$\Delta CE = [(0.17 - 1.74e-03) / 0.17]$$

$$= 0.99$$

AER FOR THE RECEIVING PIT (pounds)				
	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
HAE	8,958	8,165	8,802	9,460
ΔCE			0.99	
AER (lbs)	8,868	8,083	8,714	9,365

E. Air Quality Improvement Deduction

Pursuant to Rule 2201, Section 6.5, ten percent of all actual emission reductions are deducted as a contribution toward air quality improvement.

EMISSION REDUCTIONS AVAILABLE FOR USE AS OFFSETS (lbs)				
	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
TOTAL AER	31,823	29,419	31,267	33,604
10% DEDUCTION	3,182	2,942	3,127	3,360
AER's AVAILABLE FOR USE AS OFFSETS	28,641	26,477	28,140	30,244

F. Increase in Permitted Emissions

There will be no increase in permitted emissions.

G. Bankable Emission Reduction Credits

A portion of the available emission reductions will be used to offset the source's NSR balance for PM10 to zero. The amount of offsets required was determined in the review of applications N-1758-26-0, 27-0, 28-0, & 15-4. Thus, the amount of reductions used to offset the NSR balance for PM10 will be subtracted from the total actual emission reductions that are available for use as offsets. The remainder will be banked.

EMISSION REDUCTIONS AVAILABLE FOR BANKING (lbs)				
	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
AER's AVAILABLE FOR USE AS OFFSETS	28,641	26,477	28,140	30,244
REDUCTIONS USED TO OFFSET THE NSR BALANCE	9,288	9,391	9,494	9,494
NET AVAILABLE FOR BANKING	19,353	17,086	18,646	20,750

VI. COMPLIANCE

In order to insure compliance with Rule 2301, all emission reductions must meet the following criteria to be bankable.

A. Real

The proposed emission reductions occurred as a result of the addition of control equipment to control PM10 emissions from a rail receiving pit and the equipment used to transfer grain from the receiving pit to storage. The emissions were calculated based on logs of the amount of material received at the receiving pit for each quarter of the baseline period. The District is, therefore, satisfied that the emissions in the amounts calculated did indeed occur. Therefore, the reductions are real.

B. Enforceable

The Permits to Operate and all subsequent Permits to Operate for the equipment from which the reduction in emissions was generated will contain enforceable conditions which limit the controlled PM10 emission concentrations to the values used to quantify the reduction in emissions. As required by District policy NSR/ERC 22-1, the PM10 emission limits are performance based limitations in pounds of PM10 per ton of product received.

The performance based limitations will ensure that the minimum control efficiencies for the modified equipment will be maintained at all throughputs without affecting the potential capacity of the receiving and storage equipment. The conditions specifying the performance based limitations will include language stating that the conditions are to enforce the emission reductions from this project. This addition will ensure the enforceability of the emission reduction credits for all future actions pertaining to the Permit to Operate. The performance based conditions to enforce the PM10 emission reductions from this project are as follows:

The PM10 emissions from receiving shall not exceed 1.7e-03 pounds per ton of material received. This performance based limit is to enforce the PM10 emission reductions granted by certificate N-104-4.

The PM10 emissions from transferring material to storage shall not exceed 4.4e-03 pounds per ton of material received. This performance based limit is to enforce the PM10 emission reductions granted by certificate N-104-4.

To exceed these performance based limitations would be a violation of District rules. Therefore, the reductions are enforceable.

C. Quantifiable

The emissions were calculated based on the quarterly amount of material received, emission factors approved by the EPA, and minimum control efficiencies that are required by permit conditions. Therefore, the reductions are quantifiable.

D. Permanent

As was previously stated, the reduction in emissions was achieved by installing equipment to control PM10 emissions from two processes at this source. This control equipment will be required to remain installed and operational at all times. The equipment may not be removed or altered without first obtaining authorization from the District. Therefore, the reductions are permanent.

E. Surplus

The installation of the new control equipment was not the result of any current or proposed rule. Therefore, the reductions are surplus.

F. Timeliness

The application for ERC's was submitted after the issuance of the A/C's which authorized the reduction in emissions and prior to implementation of those A/C's. Therefore, the application for ERC's was submitted within the required 180 days from the date of reduction.

VII. RECOMMENDATION

Issue an Emission Reduction Credit Certificate to the A.L. Gilbert Company for a reduction in PM10 emissions which occurred as a result of the installation of equipment to control PM10 emissions from a rail receiving pit and from grain transferring equipment at 4431 Jessup Road in Keyes. The certificate will reflect the following amount of reductions:

EMISSION REDUCTION CREDITS (pounds)				
QUARTER	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
ERC's	19,353	17,086	18,646	20,750



San Joaquin Valley
Unified Air Pollution Control District

07 April 1995

A.L. Gilbert Co. (Berry Seed & Feed)
Richard Mueller
P.O. Box 459
Keyes, CA 95328

COPY

Re: Application # N-104-4
Project Description: Emission Reduction Credits (ERC's) from the addition of control equipment to the rail receiving pit


Dear Mr. Mueller:

The Air Pollution Control District is in receipt of the additional information requested regarding the above-referenced project, and has again reviewed the application for completeness. Based on this review, the application now appears to be complete. However, during the processing of this application, the District may request additional information to clarify, correct or otherwise supplement the information on file.

Thank you for your cooperation. Should you have any questions, please telephone Mr. Anthony Mendes of Permit Services at (209) 545-7000.

Sincerely,

Seyed Sadredin
Director of Permit Services



Anthony Mendes
Permit Services Manager

SS/AM/CV

David L. Crow
Executive Director/Air Pollution Control Officer

1999 Tuolumne Street, Suite 200 • Fresno, CA 93721 • (209) 497-1000 • FAX (209) 233-2057

Northern Region

4230 Kiernan Avenue, Suite 130 • Modesto, CA 95356
(209) 545-7000 • Fax (209) 545-8652

Central Region

1999 Tuolumne Street, Suite 200 • Fresno, CA 93721
(209) 497-1000 • Fax (209) 233-2057

Southern Region

2700 M Street, Suite 275 • Bakerfield, CA 93301
(805) 861-3682 • Fax (805) 861-2060



A. L. Gilbert Company

P.O. Box 38 - 304 N. Yosemite

Oakdale, California 95361-0038

(209) 847-1721 • 524-9261 • Fax (209) 847-3542

Bulk Dairy Feeds

Sacked Feeds

Liquid Feeds

Field Seeds

March 31, 1995

San Joaquin Valley Unified
Air Pollution Control District
4230 Kiernan Avenue, Suite 130
Modesto, Ca. 95356

Attn. Mr. Anthony Mendes

Reference: A) My letter dated 2/28/95 with 4 ATC applications and an ERC application.
Application # N-104-4
B) Your letter dated 3/21/95 requesting additional information

Dear Mr. Mendes.

Enclosed is the additional information requested by reference (B). The information submitted summarizes the total grain and pellets received by quarter from 1990 through 1992. Our records indicate the ATC # N-1758-15-2 was deemed complete 6/15/92 therefore the logical period for determining the credit would be the two year period ending 6/30/92.

As discussed during our phone conversation yesterday, we have records of actual products received in both monthly totals and by individual shipments by rail car number and truck by each individual product but are somewhat reluctant to provide that detail of data for public record. I would be happy to show you that information upon your request.

It is requested that the actual production numbers within the enclosure be held confidential as much as possible. Hopefully the above will provide the necessary information for the evaluation of the requested **EMISSION REDUCTION CREDIT**. Should you have any questions or require any additional information, don't hesitate to call.

Thank you for your assistance.

Sincerely,

Richard A. Mueller

RECEIVED
APR 03 1995

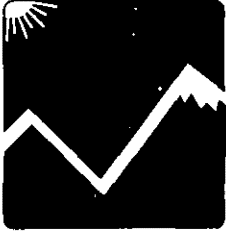
SAN JOAQUIN VALLEY
UNIFIED A.P.C.D.
NO. REGION

A.L.GILBERT COMPANY

PRODUCTS RECEIVED BY RAIL & TRUCK

MARCH 1988 - DEC. 1992

TOTALS BY QUARTER	1992	1991	1990
IV	<u>49617.3</u>	<u>61756.0</u>	<u>49534.1</u>
GRAIN	48769.8	58154.0	45612.8
PELLETS	847.5	3602.0	3921.3
III	<u>55979.4</u>	<u>52507.3</u>	<u>51043.3</u>
GRAIN	54554.7	48523.2	48431.2
PELLETS	1424.7	3984.1	2612.1
II	<u>50162.6</u>	<u>47802.2</u>	<u>48259.8</u>
GRAIN	49354.0	43600.3	45699.8
PELLETS	808.6	4201.9	2560.0
I	<u>55118.8</u>	<u>50274.6</u>	<u>45928.3</u>
GRAIN	52903.7	45697.7	41721.0
PELLETS	2215.1	4576.9	4207.3
TOTAL	<u>210878</u>	<u>212340</u>	<u>194766</u>
GRAIN	205582	195975	181465
PELLETS	5296	16365	13301



San Joaquin Valley
Unified Air Pollution Control District

March 21, 1995

A.L. Gilbert Co. (Berry Seed & Feed)
Richard Mueller
P.O. Box 459
Keyes, CA 95328

COPY

Re: Application # N-104-4
Project Description: Emission Reduction Credits (ERC's) from the addition of control equipment to the rail receiving pit

Dear Mr. Mueller:

Your application for ERC's for the above referenced project has been reviewed for completeness by the Air Pollution Control District. Based on this preliminary review, the application has been determined to be incomplete. Prior to further processing, a quarterly record of the amount of material received at the rail receiving pit for the two year period ending 31 March 1992 must be submitted to the District.


In response, please refer to the above application number, and send to the attention of Chris Valverde.

Please be advised that failure to provide the requested information within 30 days may result in the denial of the requested Authorities to Construct.

Thank you for your cooperation in this matter. Should you have any questions, please telephone Chris Valverde of Permit Services at (209) 545-7000.

Sincerely,

Seyed Sadredin
Director of Permit Services


Anthony Mendes
Permit Services Manager

SS/AM/CV ✓

David L. Crow
Executive Director/Air Pollution Control Officer

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2700 M Street, Suite 275 • Bakersfield, CA 93301
(805) 861-3682 • Fax (805) 861-2060



San Joaquin Valley
Unified Air Pollution Control District

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:
A. L. GILBERT COMPANY

2. MAILING ADDRESS:
Street/P.O. Box: **P.O. Box 459**
City: **KEYES** State: **CA.** Zip Code: **95328**

3. LOCATION OF REDUCTION:
Street: **4431 JESSUP ROAD**
City: **KEYES CA. 95328**

4. DATE OF REDUCTION: **EST 4/15/95**

5. PERMIT NO(S): **N-1758-15-2** EXISTING ERC NO(S): **N-61-4**

6. METHOD RESULTING IN EMISSION REDUCTION:
 SHUTDOWN RETROFIT PROCESS CHANGE OTHER
DESCRIPTION: **RECEIVING PIT ENCLOSURE WITH NEGATIVE AIR ON PIT AND TRANSFER TO STORAGE - CONNECTED TO BAGHOUSE** (Use additional sheets if necessary)

7. REQUESTED ERCs (In Pounds Per Calendar Quarter):

	VOC	NOx	CO	PM10	SOx	OTHER
1st QTR				18,580		
2nd QTR				18,615		
3rd QTR				20,530		
4th QTR				21,047		
TOTAL COST	\$	\$	\$	\$	\$	\$

8. SIGNATURE OF APPLICANT: **Richard A Mueller** TYPE OR PRINT TITLE OF APPLICANT: **ENGINEER**

9. TYPE OR PRINT NAME OF APPLICANT: **RICHARD A. MUELLER** DATE: **2/27/95** TELEPHONE NO: **(209) 537-0766**

FOR APCD USE ONLY:

<p>RECEIVED MAR 01 1995 SAN JOAQUIN VALLEY UNIFIED A.P.C.D. NO. REGION</p>	<p>FILING FEE RECEIVED: \$ 650.00 # 49109</p>
	<p>DATE PAID: 3-1-95</p>
<p>PROJECT NO.: 950107</p>	<p>#1758</p>

Over Counter
3-1-95

ERC APPLICATION 2/27/95 - ATC N-1758-15-2 ^{1/2}

RAIL SCALE PIT ENCLOSURE W/ NEGATIVE AIR + BAGHOUSE

EMISSION FACTORS:

PM-10 = 29% TSP

RECEIVING = 0.516/TON TSP x .29 = 0.145 lb/TON PM-10

TRANSFER TO STORAGE = 1.25 lb/TON TSP x .29 = 0.3625 lb/TON PM-10

VARIABLE EMISSIONS:

1. GRAIN + PELLETS RECEIVED QUARTERLY - TONS

	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>
1993 -	51,949	50,753	61,173	63,173
1994 -	60,001	61,339	58,557	58,618
AVERAGE -	55,975	56,046	59,865	60,896

2. PM-10 EMISSIONS - lbs/QUARTER

RECEIVING -	8,116	8,127	8,680	8,830
TRANSFER -	20,291	20,317	21,701	22,075
TOTAL PM-10	28,407	28,444	30,381	30,905

NEGATIVE AIR WITH BAGHOUSE @ 98.8 CONTROL EFFICIENCY

3. REDUCTION - 28,066 28,102 30,016 30,534 lb PM-10

4. ADDITIONS TO PM-10 EMISSIONS

a) CURRENT NSR BALANCE	48.27 lb/DAY
b) INCREASE RAIL RECEIVING TO 4000 TON/DAY	15.59 lb/DAY
c) REPLACE HOWE GRAIN CLEANER 20 → 60 T/HR	13.92 lb/DAY
d) ADDITION OF 3 ROLLER MILLS - 60 T/HR	41.76 lb/DAY
e) REPLACE GRAIN GRINDER 4 → 24 T/HR	2.09 lb/DAY
TOTAL INCREASE	121.63 lb/DAY

TOTAL INCREASE 121.63 lb PM-10 / DAY

6 DAYS / WEEK OPERATION @ 13 WEEKS / QUARTER = 78 DAYS / QUARTER

$$121.63 \times 78 \text{ DAYS} = 9,487 \text{ lb PM-10 / QUARTER}$$

	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	
N-1758-15-2					
REDUCTION	28,066	28,102	30,016	30,534	lb PM-10
ADDITIONS					
OFF-SETS	<u>9,487</u>	<u>9,487</u>	<u>9,487</u>	<u>9,487</u>	lb PM-10
BANKABLE					
ERC	18,579	18,615	20,529	21,047	lb PM-10

NSR BALANCE = 0 PM-10



A. L. GILBERT COMPANY

GRAIN • FEEDS

P.O. Box 38 — 304 North Yosemite Ave.
Oakdale, California 95361

049109

11-57/615
1210



DATE CHECK NO. DISCOUNT AMOUNT

MARCH 1, 1995 49109

000000650.00 \$650.00

THE
HERE OF

SAN JOAQUIN VALLEY
UNIFIED AIR POLLUTION CD
4230 KIERNAN AVE, STE 130
MODESTO, CA 95356

A. L. GILBERT COMPANY

D. L. Gilbert
Jack P. Ulrich

⑈049109⑈ ⑆121000578⑆ ⑆15600008⑈ 11

PLEASE DETACH BEFORE DEPOSITING

DESCRIPTION	AMOUNT	DEDUCTION	NET AMOUNT
ERC APPLICATION	650.00		
RECEIVED MAR 01 1995 SAN JOAQUIN VALLEY UNIFIED A.P.C.D. NO. REGION			650.00

A. L. GILBERT COMPANY
P.O. Box 38 - 304 North Yosemite Ave.
Oakdale, Calif. 95361

049109

PROJECT ROUTING FORM

PROJECT NUMBER: 950107 FACILITY ID: 1758 Cert. # N-104-4
 PERMIT NOs: _____
 APPLICANT NAME: A.L. GILBERT COMPANY
 HOME ADDRESS: 4431 JESSUP ROAD, KEYES

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete				
B. Application Deemed Complete <input type="checkbox"/> Awaiting CB Officers	(W)	4/7/95		
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INIT	DATE
E. Engineering Evaluation Complete		
F. Supervising Engineer Approval		
G. Compliance Division Approval <input type="checkbox"/> Not Required		
H. Permit Services Manager Approval		

Director Review: Not Required Required

LOCAL 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 2315, Sacramento, CA 95812
- _____
COMPLIANCE _____ SJVUAPCD - 1999 Tuolumne St., Fresno, CA 93721 Attn: Seyed Sadredin
- _____
PREMISE FILE
- _____
BLDG DEPT _____ OTHER _____

