



October 22, 2020

Jonathan Meyer
Treehouse California Almonds, LLC.
PO Box 12150
Earlimart, CA 93219

RE: Notice of Final Action - Authority to Construct
Facility Number: S-634
Project Number: S-1201769

Dear Mr. Meyer:

The Air Pollution Control Officer has issued the Authority to Construct permit to Treehouse California Almonds, LLC. for an air curtain burner to combust wood waste from an almond pre-cleaning operation, at 2115 Road 144, in Delano. Enclosed are the Authority to Construct permit and a copy of the notice of final action that has been posted on the District's website (www.valleyair.org).

Notice of the District's preliminary decision to issue the Authority to Construct permit was posted on September 15th, 2020. The District's analysis of the proposal was also sent to CARB on September 16th. 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.

Samir Sheikh
Executive Director/Air Pollution Control Officer

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

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

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

Mr. Jonathan Meyer
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

A handwritten signature in blue ink, reading "Arnaud Marjollet". The signature is fluid and cursive, with a horizontal line drawn underneath the name.

Arnaud Marjollet
Director of Permit Services

AM:SP

Enclosures

cc: Courtney Graham, CARB (w/ enclosure) via email



Facility # S-634
TREEHOUSE CALIFORNIA ALMONDS LLC
PO BOX 12150
EARLIMART, CA 93219

AUTHORITY TO CONSTRUCT (ATC)

QUICK START GUIDE

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
3. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
4. **Notify District:** You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
5. **Source Test:** Schedule and perform any required source testing. See http://www.valleyair.org/busind/comply/source_testing.htm for source testing resources.
6. **Maintain Records:** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years. Sample record keeping forms can be found at http://www.valleyair.org/busind/comply/compliance_forms.htm.

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

**For assistance, please contact District Compliance staff at
any of the telephone numbers listed below.**

Samir Sheikh

Executive Director/Air Pollution Control Officer

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AUTHORITY TO CONSTRUCT

PERMIT NO: S-634-11-0

ISSUANCE DATE: 10/15/2020

LEGAL OWNER OR OPERATOR: TREEHOUSE CALIFORNIA ALMONDS LLC

MAILING ADDRESS: PO BOX 12150
EARLIMART, CA 93219

LOCATION: 2115 ROAD 144
DELANO, CA 93215

EQUIPMENT DESCRIPTION:

AIR BURNERS INC. MODEL S-220 AIR CURTAIN BURNER WITH A FAN POWERED BY A PERMIT EXEMPT IC ENGINE (50 BHP OR LESS)

CONDITIONS

1. Within 12 months of initial operation of this air curtain incinerator, the operator shall submit a complete application for a Title V operating permit to the District for compliance with New Source Performance Standard Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units. [40 CFR 60.2242]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. The air curtain incinerator shall burn no more than 56 tons of waste material in any one day. [District Rules 2201 and 4102]
5. The air curtain incinerator shall burn no more than 1,000 tons of waste material in any year. [District Rules 2201 and 4102]
6. The amount of ash handled shall not exceed 1.68 ton in any one day. [District Rules 2201 and 4102]
7. The amount of ash handled shall not exceed 30 tons in any year. [District Rules 2201 and 4102]
8. Emissions (in units of pounds per ton of waste material) from the air curtain incinerator shall not exceed any of the following limits: 1.0 lb-NOx/ton, 0.1 lb-SOx/ton, 1.3 lb-PM10/ton, 2.6 lb-CO/ton, or 0.9 lb-VOC/ton. [District Rule 2201]
9. Emissions from ash handling shall not exceed 0.23 lb-PM10/ton. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

S-634-11-0 : Oct 15 2020 4:40PM -- PROCOPIS : Joint Inspection NOT Required

10. The air curtain incinerator shall be operated according to manufacturer's specifications and in a manner to minimize emissions of air contaminants into the atmosphere. This includes but is not limited to the following prohibitions: biomass shall not protrude from the firebox into the air curtain, flames shall not be visible above the air curtain, and plumes of ash shall not be generated due to excessive loading. [District Rules 2201 and 4102]
11. The air curtain incinerator shall burn only biomass waste material, including almond wood sticks generated onsite as a byproduct of almond processing. [District Rules 2201 and 4102]
12. For conducting a cold start, the operator shall use a propane or butane torch, driptorch, or flare to ignite the material inside the air curtain incinerator. No accelerants (e.g. gasoline, diesel fuel, kerosene, turpentine) may be used. [District Rules 2201 and 4102]
13. During the startup period that is within the first 30 minutes of operation, visible emissions from the air curtain incinerator shall not equal or exceed Ringelmann 1 or 20% opacity for more than 3 minutes in any one hour. [District Rules 2201 and 4101]
14. After the startup period, during steady state operation, visible emissions from the air curtain incinerator shall not equal or exceed either of the following limits: Ringelmann 1 or 20% opacity for more than 3 minutes in any one hour or 10% opacity as determined by the average of three 1-hour blocks consisting of ten 6-minute average opacity values. [District Rules 2201 and 4101]
15. Opacity testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance opacity testing and an opacity test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
16. Compliance with the opacity limits on this permit shall be determined by EPA Method 9. [District Rule 4101]
17. The operator shall conduct periodic testing for opacity at least once every 12 calendar months. Opacity testing shall consist of one 30-minute cold start observation, and three 1 hour observations under normal steady state operation. [District Rule 1081]
18. Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. [District Rule 1081]
19. The permittee shall submit to the District the opacity test results report in paper or electronic format within 60 days of completion of the field test. The opacity results shall include information regarding the charge rate during opacity observation. [District Rule 1081]
20. Within 60 days after achieving the maximum production rate at which the unit will be operated, but no later than 180 days after initial startup, the owner or operator shall conduct performance test(s). [District Rule 1081]
21. After operation is completed for a day, the fire in the firebox will be snuffed out and will not be allowed to smolder overnight. Ash from the firebox will be emptied in a manner to minimize emissions. [District Rules 2201 and 4102]
22. Ash removed from the firebox shall be handled, stored, and disposed of in a manner minimizing entrainment into the atmosphere. [District Rules 2201 and 4102]
23. The operator shall keep records of all initial and annual opacity test results and reports onsite in either paper copy or electronic format for at least 5 years. [District Rule 1070]
24. The permittee shall maintain daily and cumulative annual records of the tons of waste material burned in the air curtain incinerator. [District Rule 2201]
25. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4702]