



December 21, 2020

Micah Stanley
Prime Cattle, LLC
20799 Road 132
Tulare, CA 93274

Re: Notice of Preliminary Decision – Permit to Operate
Facility Number: S-9647
Project Number: S-1201734

Dear Mr. Stanley:

Enclosed for your review and comment is the District's analysis of Prime Cattle, LLC's application for Permits to Operate for a feedlot operation, at 14529 Avenue 216 in Tulare, CA.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice period, the District intends to issue the Permits to Operate. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Thomas Aguirre of Permit Services at (661) 392-5613.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM:ta

Enclosures

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

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

San Joaquin Valley Air Pollution Control District

In-house Permit to Operate Application Review

Feedlot Operation

Facility Name: Prime Cattle, LLC
Mailing Address: 20799 Road 132
Tulare, CA 93274

Date: August 31, 2020
Engineer: Thomas Aguirre
Lead Engineer: Rich Karrs
RWK 11/02/20

Contact Person: Bruce Livingston
Telephone: 559-687-1440
Facility ID: S-9647

Project #: 1201734

Deemed Complete: May 12, 2020

I. Proposal

Prime Cattle is applying for In-house Permits to Operate for their 8,240 head cattle feedlot.

The emission units for this facility were installed prior to June 10, 2010 and did not require a permit at the time of installation. Therefore, pursuant to Rule 2020 Section 9.0, this permit action is due to a loss of exemption, will be processed as a Permit to Operate application, and will not be subject to the requirements of Rule 2201.

II. Applicable Rules

Rule 1070 Inspections (12/17/92)
Rule 2010 Permits Required (12/17/92)
Rule 2020 Exemptions (12/20/07)
Rule 2201 New and Modified Stationary Source Review Rule (8/15/19)
Rule 2520 Federally Mandated Operating Permits (8/15/19)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4550 Conservation Management Practices (CMP) (8/19/04)
Rule 4570 Confined Animal Facilities (CAF) (10/21/10)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
California Environmental Quality Act (CEQA)

III. Project Location

The feedlot is located at 14529 Avenue 216 in Tulare, CA.

IV. Process Description

The primary function of a feedlot is to raise and feed cattle until they reach a slaughter weight of 1,050 to 1,150 pounds for heifers and 1,150 and 1,250 pounds for steers. Feedlots start with animals weighing as little as 275 lbs to 400 lbs. Each feedlot varies in the initial size of the animal being raised. Cattle on average generate anywhere from 60-80 lbs/manure per day head.

Cattle manure is collected and managed mainly as a solid. Manure accumulates in confinement areas in the pens similar to open corrals, and is primarily deposited in areas where the herd is fed and watered.

The majority of cattle feedlots are open corrals, which may be partially paved. Generally, paving, if present, is limited to a concrete apron typically located along feed bunks and around watering troughs because these are areas of heaviest animal traffic and manure accumulation (Bodman, et al., 1987).

A. Type of Feedlot

Scrape

This feedlot is a scrape feedlot since the manure and bedding from the pens and shade structures are collected by a tractor or by a mechanical scraper.

The rate of manure accumulation in drylots and pens for the cattle is highest along feed bunks and watering troughs these areas will be scraped more frequently than other areas. These areas are usually paved with concrete.

B. Cattle Housing

Open Corrals/Pens

Cattle are segregated in pens designed for efficient movement of cattle, optimum drainage, and easy feed truck access. Pens are large open area where cattle are confined, with unlimited access to feed bunks, water, and possibly an open structure to provide shade. Cattle housing space needs vary with the amount of paved space, soil type, drainage, annual rainfall, and freezing and thawing cycles. These types of operations may use mounds to improve drainage and provide areas that dry quickly, since dry resting areas improve cattle comfort, health, and feed utilization.

In open feedlots, protection from weather is often limited to a windbreaker near a fence in the winter and/or sunshade in the summer.

This feedlot consists of pens with both shaded areas and pens without shade. Shaded areas offer more comfort for the cattle and also serve as a potential of generating less dust. Cattle will stay out of the sun if shade is provided, hence causing less disturbance of the soil.

C. Miscellaneous Sources of Emissions

Land Application

The facility applies the cattle manure to their cropland by means of flood irrigation.

Off-Site Disposal

This feedlot hauls the cattle manure off-site, possibly to land for a neighboring farm.

V. Equipment Listing

S-9647-1-0: CATTLE HOUSING – SCRAPE FEEDLOT CONSISTING OF 8,240 CATTLE INCLUDING SHADED PENS

S-9647-2-0: LIQUID MANURE HANDLING SYSTEM CONSISTING OF 2 STORAGE PONDS; MANURE IS LAND APPLIED THROUGH FLOOD IRRIGATION AND/OR HAULED OFFSITE

S-9647-3-0: FEED STORAGE AND HANDLING CONSISTING OF COVERED FEED STORAGE OR COMMODITY BARN

S-9647-4-0: SOLID MANURE HANDLING; SOLID MANURE HAULED OFFSITE:

VI. General Calculations

This project is not subject to District Rule 2201 since the facility was formerly exempt from obtaining permits. Therefore, formal calculations for Rule 2201 are not required and only the Actual Emissions (AE) and the Stationary Source Potential to Emit (SSPE) will be calculated for reference purposes.

A. Assumptions

- Potential to Emit calculations for the feedlot will be based on the maximum capacity of the feedlot since the number of cattle at the feedlot fluctuate on a continuous basis.
- Only emissions from the storage ponds will be used in determining if this facility will be a major source since the lagoon emissions are considered to be the only non-fugitive emissions at a feedlot.
- The basis of the Emission Factors used in this evaluation is from the “APCO’s Revision to the Dairy VOC Emission Factor”, dated January 2010. These emission factors are controlled Emission Factors and contain mitigation measures from Rule 4570 (as adopted in 2010).
- To be conservative, the uncontrolled EFs (assuming no Rule 4570 VOC mitigation measures were in place) will be used to calculate emissions

B. Emission Factors

Feedlot Cattle VOC Emissions Factors (lb/hd-yr)		
		Beef Feedlot Cattle
Cow Housing	Enteric Emissions in Cow Housing	1.2
	Non-Enteric Emissions in Cow Housing (Corrals/Pens)	2.5
	Cow Housing Total	3.7
Solid Manure Handling	Solid Manure Handling Total (storage, piles, land application, etc.)	0.9
Feed	Feed storage and handling (grains – non-silage feed)	0
Overall Total (lb-VOC/hd-yr)		4.6

PM ₁₀ Emission Factor (EF) (lbs- PM ₁₀ /hd-yr)			
Type of Cow	Type of Housing	EF	Source
Feedlot Cattle and all Heifers	Open corrals w/no shade structure	10.55	CARB/SJVAPCD
Feedlot Cattle and all Heifers	Open corrals with shade structure	9.67	CARB/SJVAPCD

Feed Handling and Storage

The most recent emissions study conducted by Dr. Mitloehner, a researcher with UC Davis, shows that emissions from calf and feedlot cattle feed were not detected¹. Since all of the feedlot and calf operations feed dry grains and hay, which does not include silage, then it will be assumed that emissions from the feed from these facilities are negligible. Therefore, emissions from dry feed will be considered to have no emissions.

¹ A letter received from Dr. Mitloehner in regards to an emissions study on manure, enteric, and feed emissions.

Post-Rule 4570:

CONTROL EFFICIENCY FROM MITIGATIONS

The applicant has selected the following mitigation measures, providing the VOC controls as shown below:

S-9647-1-0 Cow Housing

Enteric Emissions Mitigations		
Apply	Mitigation	CE (%)
1	Feed according to National Research Council (NRC) guidelines.	10
Total CE		10

Corrals/Pens Mitigations		
Apply	Mitigation	CE (%)
1	Feed according to National Research Council (NRC) guidelines.	10
1	Scrape corrals twice a year with at least 90 days between cleanings, excluding the removal of in-coral mounds.	10
1	Inspect water pipes and troughs and repair leaks at least once every seven (7) days	10
1	Implement one of the following: 1) slope the surface of the corrals at least 3% where the available space for each animal is 400 sq.ft. or less and slope the surface of the corrals at least 1.5% where the available space for each animal is more than 400 sq. ft.; 2) maintain corrals to ensure proper drainage preventing water from standing more than 48 hrs.; 3) harrow, rake, or scrape pens sufficiently to maintain a dry surface	10
	Install shade structure such that they are constructed with a light permeable roofing material	0
	Install all shade structures uphill of any slope in the corral	0
1	Install shade structure so that the structure has a North/South orientation	10

	Manage corrals such that the manure depth in the corral does not exceed twelve (12) inches at any time or point, except for in-corral mounding. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. The facility must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible.	10
	Knockdown fence line manure build-up prior to it exceeding a height of twelve (12) inches at any time or point. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. The facility must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible.	0
Total CE		60

S9647-2-0: Liquid Manure Handling

Lagoons/Storage Ponds Mitigations		
Apply	Mitigation	CE (%)
1	Feed according to National Research Council (NRC) guidelines.	10
	Use phototropic lagoon.	0
	Use an anaerobic treatment lagoon designed according to NRCS Guideline No. 359.	0
	Remove solids from the waste system with a solid separator system, prior to the waste entering the lagoon	
1	Maintain lagoon pH between 6.5 and 7.5.	10
Total CE		20

Liquid Manure Land Application Mitigations		
Apply	Mitigation	CE (%)
1	Feed according to National Research Council (NRC) guidelines.	10
	Only apply liquid manure that has been treated with an anaerobic or aerobic treatment lagoon, aerobic lagoon, or digester system.	
1	Allow liquid manure to stand in the fields for no more than twenty-four (24) hours after irrigation	10
	Apply liquid/slurry manure via injection with drag hose or similar apparatus.	0
Total CE		20

S-9647-4-0: Solid Manure Handling

Solid Manure Storage Mitigations		
Apply	Mitigation	CE (%)
1	Feed according to National Research Council (NRC) guidelines.	10
1	Within 72 hours of removal from housing, either a) remove dry manure from the facility, or b) cover dry manure outside the housing with a weatherproof covering from October through May, except for times when wind events remove the covering, not to exceed 24 hours per event.	10
	Manage moisture content of manure to less than 50%	
Total CE		20

Solid Manure Land Application Mitigations		
Apply	Mitigation	CE (%)
1	Feed according to National Research Council (NRC) guidelines.	10
	Incorporate all solid manure within 72 hours of land application	0
	Only apply solid manure that has been treated with an anaerobic treatment lagoon, aerobic lagoon or digester system.	0
	Apply no solid manure with a moisture content of more than 50%.	0
Total CE		10

S-9647-1-0 Feed

Feed Mitigations		
Apply	Mitigation	CE (%)
1	Feed according to National Research Council (NRC) guidelines.	10
	Feed steam-flaked, dry rolled, cracked or ground corn or other ground cereal grains.	0
1	Remove uneaten wet feed from feed bunks within 24 hours after the end of a rain event.	10
Total CE		20

Post-Rule 4570

The mitigation measures do not affect PM10 emissions from the cow housing. Therefore, EF2 = EF1 for this permit unit.

PM ₁₀ Emission Factor (EF) (lbs- PM ₁₀ /hd-yr)			
Type of Cow	Type of Housing	EF	Source
Feedlot Cattle and all Heifers	Open corrals w/no shade structure	10.55	CARB/SJVAPCD
Feedlot Cattle and all Heifers	Open corrals with shade structure	9.67	CARB/SJVAPCD

The mitigation measures will reduce VOC emissions from the following emission units and are calculated as follows:

$$\begin{aligned} \text{EF2} &= \text{EF1} \times (1 - \text{Total CE}) \\ &= 1.2 \text{ lb-VOC/hd-yr} \times (1 - 0.10) \\ &= 1.1 \text{ lb-VOC/hd-yr} \end{aligned}$$

Feedlot Cattle Emissions Factors (lb/hd-yr)		
		Beef Feedlot Cattle
Cow Housing	Enteric Emissions in Cow Housing	1.0
	Non-Enteric Emissions in Cow Housing (Corrals/Pens)	1.0
	Cow Housing Total	2.0
Solid Manure Handling	Solid Manure Handling Total (storage, piles, land application, etc.)	0.8
Feed	Feed storage and handling (grains – non-silage feed)	0
Overall Total (lb-VOC/hd-yr)		2.8

C. Potential to Emit

1. Daily and Annual Potential to Emit (PE)

Daily and Annual VOC Actual and Potential to Emit Emissions						
Daily Potential to Emit						
Type of Animal	Number of Cattle	EF	days/yr	lbs-VOC/day		
Cow Housing	8,240	x	2.0	÷	365	45.2
Solid Manure	8,240	x	0.8	÷	365	18.1
Feed	8,240	x	0	÷	365	0
Total						63.3
Annual Potential to Emit						
Type of Animal	Number of Cattle	EF	lbs-VOC/yr			
Cow Housing	8,240	x	2.0	16,480		

Solid Manure	8,240	x	0.8	6,592
Feed	8,240	x	0	0
Total				23,072

Daily and Annual PM₁₀ Actual and Potential to Emit Emissions					
Daily Potential to Emit					
Type of Animal	Number of Cows		lb-PM₁₀/yr	days/yr	lbs- PM₁₀/day
Cattle	8,240	x	9.67	÷ 365	218.3
Total					218.3
Annual Potential to Emit					
Type of Animal	Number of Cows		lb-PM₁₀/yr		lbs- PM₁₀/yr
Cattle	8,240	x	9.67		79,680
Total					79,680

Lagoon/Storage Pond Emissions (Flushed Freestalls & Flushed Corrals)			
Daily Potential to Emit			
Type of Cow	Number of Cows	lb-VOC/hd-yr	lbs-VOC/yr
Heifers	2,240	X 0.6	1,344
Calves	6,000	X 0.1	600
Total			1,944

2. Stationary Source Potential to Emit (SSPE)

The Stationary Source Potential to Emit (SSPE) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source.

The SSPE is shown in the table below:

Stationary Source Potential to Emit [SSPE] (lb/year)					
Permit Unit	NO_x	SO_x	PM₁₀	CO	VOC
S-9647-1-0	0	0	79,680	0	16,480
S-9647-2-0	0	0	0	0	1,944
S-9647-3-0	0	0	0	0	0
S-9647-4-0	0	0	0	0	6,592
Stationary Source Potential to Emit	0	0	79,680	0	25,016

3. Major Source Determination

Pursuant to Section 3.25 of District Rule 2201, a major source is a stationary source with post-project emissions or a post-project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.25.2 states, “for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Since emissions at a feedlot are not actually collected, a determination of whether emissions could be reasonably collected must be made by the permitting authority. The California Air Pollution Control Association (CAPCOA) prepared guidance in 2005 for estimating potential to emit of Volatile Organic Compounds from dairy farms. The guidance states that *“VOC emissions from the milking centers, cow housing areas, corrals, common manure storage areas, and land application of manure are not physically contained and could not reasonably pass through a stack, chimney, vent, or other functionally-equivalent opening. No collection technologies currently exist for VOC emissions from these emissions units. Therefore, the VOC emissions from these sources are considered fugitive.”* The guidance also concludes that, because VOC collection technologies do exist for liquid waste systems at dairies, *“... the VOC emissions from waste lagoons and storage ponds are considered non-fugitive.”* In addition, EPA has determined that emissions from open-air cattle feedlots are fugitive in nature.² Therefore, emissions from feedlots will be considered fugitive sources, except for emissions from non-fugitive sources, such as lagoons, storage ponds, IC engines, and gasoline tanks, will be used to determine if dairies are major sources.

As shown in the assumptions, only emissions from the storage ponds will be used in determining if this facility is a major source. As a worst-case assumption, it will be assumed that all manure from the feedlot is flushed into the lagoon. The emissions from the lagoon/storage pond are calculated as follows:

² Letter from William Wehrum, EPA Acting Administrator, to Terry Stokes, Chief Executive Officer – National Cattlemen’s Beef Association (November 2, 2006)
(<http://www.epa.gov/Region7/programs/artd/air/nsr/nsrmemos/cowdust.pdf>)

The emissions are calculated as follows:

Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
S-9647-1-0	0	0	0	0	0
S-9647-2-0 (Lagoon/Storage Pond)	0	0	0	0	1,944
S-9647-3-0	0	0	0	0	0
S-9647-4-0	0	0	0	0	0
Stationary Source Potential to Emit	0	0	0	0	1,944
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No

As seen in the table above, the facility is **not** a Major Source.

VII. Compliance

Rule 1070 Inspections

This rule applies to any source operation, which emits or may emit air contaminants.

This rule allows the District to perform inspections for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations. The rule also allows the District to require record keeping, to make inspections and to conduct tests of air pollution sources. Therefore, the following conditions will be listed on each PTO to ensure compliance:

{3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]

{3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]

Rule 2010 Permits Required

The provisions of this rule apply to any person who plans to or does operate, construct, alter, or replace any source operation, which may emit air contaminants or may reduce the emission of air contaminants.

Pursuant to Section 4.0, a written permit shall be obtained from the APCO. No Permit to Operate shall be granted either by the APCO or the Hearing Board for any source operation described in Section 3.0 constructed or installed without authorization as

required by Section 3.0 until the information required is presented to the APCO and such source operation is altered, if necessary, and made to conform to the standards set forth in Rule 2070 (Standards for Granting Applications) and elsewhere in these rules and regulations.

Rule 2020 Exemptions

Prior to the passing of Senate Bill 700, agricultural operations were exempt from permits in California. With the passage of SB 700, as of January 1, 2004, agricultural operations lost their exemption per District Rule 2020 (Exemptions, Section 9 [September 17, 1998]), and became subject to the provisions of District Rule 2010 (Permits Required), but shall not be subject to District Rule 2201 (New and Modified Stationary Source Review Rule) unless modified or replaced.

Rule 2201 New and Modified Stationary Source Review Rule

An emission unit that was installed at a time when permits were not required is exempt from the District's NSR Rule for the initial permitting action, per District Rule 2020, Section 9.0. Therefore, as shown above, this **feedlot** is not subject to the requirements of this rule until the **feedlot** modifies its operation.

Rule 2520 Federally Mandated Operating Permits

Since this facility's potential emissions do not exceed any major source thresholds of Rule 2201, as shown previously in the Major Source Determination table in Section VII.C.4, this facility is not a major source, and Rule 2520 does not apply.

Rule 4101 Visible Emissions

Rule 4101 states that 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.

Feedlot:

Pursuant to Section 4.12, Emissions subject to or specifically exempt from Regulation VIII (Fugitive PM10 Prohibitions) are considered to be exempt. Thus, according to Rule 8011.4.4 "Exemptions" and as defined in 8011.3.35, On-field agricultural sources are exempt.

Therefore, this rule does not apply to activities conducted solely for the raising of cattle.

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance.

Pursuant to Section 3.1, the provisions of this rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowl or animals as defined in Rule 4103 (Open Burning).

Therefore this Rule does not apply to this feedlot.

Rule 4550 Conservation Management Practices (CMP)

This rule applies to agricultural operation sites located within the San Joaquin Valley Air Basin. The purpose of this rule is to limit fugitive dust emissions from agricultural operation sites.

Pursuant to Section 5.1, effective on and after July 1, 2004, an owner/operator shall implement the applicable CMPs selected pursuant to Section 6.2 for each agricultural operation site.

Pursuant to Section 5.2, an owner/operator shall prepare and submit a CMP application for each agricultural operation site to the APCO for approval.

The facility received District approval for its CMP plan. Continued compliance with the requirements of District Rule 4550 is expected.

Rule 4570 Confined Animal Facilities (CAF)

This rule applies to Confined Animal Facilities (CAF) located within the San Joaquin Valley Air Basin. The purpose of this rule is to limit emissions of volatile organic compounds (VOC) from Confined Animal Facilities (CAF). The Rule applies to feedlots with greater than 3,500 cattle

The applicant submitted an Authority to Construct Permit (ATC) application to comply with the requirements of this Rule. The requirements of this rule will be incorporated into this project.

Section 5.0 Requirements

Pursuant to Section 5.1, owners/operators of any CAF shall submit, for approval by the APCO, a permit application for each Confined Animal Facility.

Pursuant to Section 5.1.2, a thirty-day public noticing and commenting period shall be required for all large CAF's receiving their initial Permit-to-Operate or Authority-to-Construct.

The applicant has submitted an application containing all the requirements above. Since public noticing is required for this project, a public notice will be published in a

local newspaper of general circulation and/or the valleyair.org website prior to the issuance of these ATC's.

Pursuant to Section 5.1.3, owners/operators shall submit a facility emissions mitigation plan of the Permit-to-Operate application or Authority-to-Construct application. The mitigation plan shall contain the following information:

- The name, business address, and phone number of the owners/operators responsible for the preparation and the implementation of the mitigation measures listed in the permit.
- The signature of the owners/operators attesting to the accuracy of the information provided and adherence to implementing the activities specified in the mitigation plan at all times and the date that the application was signed.
- A list of all mitigation measures shall be chosen from the application portions of Sections 5.5 or 5.6.

Pursuant to Section 5.1.4, the Permit-to-Operate or Authority-to-Construct application shall include the following information, which is in addition to the facility emission mitigation plan:

- The maximum number of animals at the facility in each production stage (facility capacity).
- Any other information necessary for the District to prepare an emission inventory of all regulated air pollutants emitted from the facility as determined by the APCO.
- The approved mitigation measures from the facility's mitigation plan will be listed on the Permit to Operate or Authority-to-Construct as permit conditions.
- The District shall act upon the Authority to Construct application or Permit to Operate application within six (6) months of receiving a complete application.

Pursuant to Section 5.1.6, the District shall act upon the Authority to Construct application or Permit to Operate application within six (6) months of receiving a complete application.

Pursuant to Section 5.3, owners/operators of any CAF shall implement all VOC emission mitigation measures, as contained in the permit application, on and after 365 days from the date of issuance of either the Authority-to-Construct or the Permit-to-Operate whichever is sooner.

Pursuant to Section 5.4, an owner/operator may temporarily suspend use of mitigation measure(s) provided all of the following requirements are met:

- It is determined by a licensed veterinarian, certified nutritionist, CDFA, or USDA that any mitigation measure being suspended is detrimental to animal health or necessary for the animal to molt, and a signed written copy of this determination shall be retained on-site and made available for inspection upon request.
- The owner/operator notifies the District, within forty-eight (48) hours of the determination that the mitigation measure is being temporarily suspended; the

specific health condition requiring the mitigation measure to be suspended; and the duration that the measure must be suspended for animal health reasons,

- The emission mitigation measure is not suspended for longer than recommended by the licensed veterinarian or certified nutritionist for animal health reasons,
- If such a situation exists, or is expected to exist for longer than thirty (30) days, the owners/operators shall, within that thirty (30) day period, submit a new emission mitigation plan designating a mitigation measure to be implemented in lieu of the mitigation measure that was suspended, and
- The APCO, ARB, and EPA approve the temporary suspension of the mitigation measure for the time period requested by the owner/operator and a signed written copy of this determination shall be retained on site.

The following condition will be placed on each permit.

- {4452} If a licensed veterinarian or a certified nutritionist determines that any VOC mitigation measure will be required to be suspended as a detriment to animal health or necessary for the animal to molt, the owners/operators must notify the District in writing within forty-eight (48) hours of the determination including the duration and the specific health condition requiring the mitigation measure to be suspended. If the situation is expected to exist longer than a thirty-day (30) period, the permittee shall submit a new emission mitigation plan designating a mitigation measure to be implemented in lieu of the suspended mitigation measure. [District Rule 4570]

Section 7.0 Administrative Requirements

Section 7.2 General Records for CAFs Subject to Section 5.0 Requirements:

- Copies of all of the facility's permits
- Copies of all laboratory tests, calculations, logs, records, and other information required to demonstrate compliance with all applicable requirements of this rule, as determined by the APCO, ARB, EPA.
- Records of the number of animals of each species and production group at the facility on the permit issuance date. Quarterly records of any changes to this information shall also be maintained, (e.g. Dairy Herd Improvement Association records, animal inventories done for financial purposes, etc.)

The following condition will be placed on the cow housing permit:

- {4449} Permittee shall maintain a record of the number of animals of each species and production group at the facility and shall maintain quarterly records of any changes to this information. [District Rule 4570]

Specific recordkeeping and monitoring conditions are shown below under the appropriate mitigation measures.

Pursuant to Section 7.9, owners/operators of a CAF subject to the requirements of Section 5.0 shall keep and maintain the required records in Sections 7.1 through 7.8.4, as applicable, for a minimum of five (5) years and the records shall be made available

to the APCO and EPA upon request. Therefore, the following condition will be placed on the permit:

- {4453} Permittee shall keep and maintain all records for a minimum of five (5) years and shall make records available to the APCO and EPA upon request. [District Rule 4570]

Section 7.10 requires specific monitoring or source testing conditions for each mitigation measure. These conditions are shown below with each mitigation measure.

The feedlot has chosen the following Mitigation Measures. All conditions required for compliance with Rule 4570 for the mitigation measures selected by the applicant are shown below. These conditions will be placed on the appropriate permits.

- {4452} If a licensed veterinarian or a certified nutritionist determines that any VOC mitigation measure will be required to be suspended as a detriment to animal health or necessary for the animal to molt, the owners/operators must notify the District in writing within forty-eight (48) hours of the determination including the duration and the specific health condition requiring the mitigation measure to be suspended. If the situation is expected to exist longer than a thirty-day (30) period, the permittee shall submit a new emission mitigation plan designating a mitigation measure to be implemented in lieu of the suspended mitigation measure. [District Rule 4570]
- {4453} Permittee shall keep and maintain all records for a minimum of five (5) years and shall make records available to the APCO and EPA upon request. [District Rule 4570]

Feed Mitigation Measures Required

Required

Feed according to National Research Council (NRC) guidelines.

- {4454} Permittee shall feed all animals according to National Research Council (NRC) guidelines. [District Rule 4570]
- {4455} Permittee shall maintain records of feed content, formulation, and quantity of feed additive utilized, to demonstrate compliance with National Research Council (NRC) guidelines. Records such as feed company guaranteed analyses (feed tags), ration sheets, or feed purchase records may be used to meet this requirement. [District Rule 4570]

Feed steam-flaked, dry rolled, cracked or ground corn or other steam-flaked, dry rolled, cracked or ground cereal grains

- {4462} Permittee shall feed steam-flaked, dry rolled, cracked or ground corn or other steam-flaked, dry rolled, cracked or ground cereal grains. [District Rule 4570]

- {4463} Permittee shall maintain records to demonstrate animals are fed steam-flaked, dry rolled, cracked or ground corn or other steam-flaked, dry rolled, cracked or ground cereal grains. Records such as feed company guaranteed analyses (feed tags), ration sheets, or feed purchase records may be used to meet this requirement. [District Rule 4570]

Corral

Required

Scrape corrals twice a year with at least 90 days between cleanings, excluding the removal of in-corral mounds.

- {4617} Permittee shall scrape corrals, excluding the removal of in-corral mounds at least two (2) times per year with at least ninety (90) days between each cleaning. [District Rule 4570]
- {4618} Permittee shall maintain records demonstrating that manure from corrals are cleaned at least two (2) times per year with at least ninety (90) days between each cleaning. [District Rule 4570]

Inspect water pipes and troughs and repair leaks at least once every seven (7) days.

- {4499} Permittee shall inspect water pipes and troughs and repair leaks at least once every seven (7) days. [District Rule 4570]
- {4500} Permittee shall maintain records demonstrating that water pipes and troughs are inspected and leaks are repaired at least once every seven (7) days. [District Rule 4570]

Implement one of the following three mitigation measures: 1) slope the surface of the corrals at least 3% where the available space for each animal is 400 square feet or less, and slope the surface of the corrals at least 1.5% where the available space for each animal is more than 400 square feet per animal; 2) maintain corrals to ensure proper drainage preventing water from standing more than forty-eight hours; or 3) harrow, rake, or scrape pens sufficiently to maintain a dry surface.

- {4626} Permittee shall implement at least one of the following corral mitigation measures: 1) slope the surface of the corrals at least 3% where the available space for each animal is 400 square feet or less and shall slope the surface of the corrals at least 1.5% where the available space for each animal is more than 400 square feet per animal; 2) maintain corrals to ensure proper drainage preventing water from standing more than forty-eight hours; or 3) harrow, rake, or scrape pens sufficiently to maintain a dry surface except during periods of rainy weather or when the corrals have not held animals in the last thirty days. [District Rule 4570]

- {4555} Permittee shall either 1) maintain sufficient records to demonstrate that corrals are maintained to ensure proper drainage preventing water from standing for more than forty-eight hours or 2) maintain records of dates pens are groomed (i.e., harrowed, raked, or scraped, etc.). [District Rule 4570]

Shade structures in corrals.

- Shade structures shall be installed in any of the following ways: 1) constructed with a light permeable roofing material; 2) uphill of any slope in the corral; 3) installed so that the structure has a North/South orientation. OR Permittee shall clean manure from under corral shades at least once every fourteen (14) days, when weather permits access into the corral. [District Rule 4570]
- If permittee has selected to comply using shades constructed with a light permeable roofing material, then permittee shall maintain records, such as design specifications, demonstrating that the shade structures are equipped with such roofing material or if permittee has selected to comply by cleaning the manure from under the corral shades, then permittee shall maintain records demonstrating that manure is cleaned from under the shades at least once every fourteen (14) days, as long as weather permits access to corrals. [District Rule 4570]

Manage corrals such that the manure depth in the corral does not exceed twelve (12) inches at any time or point, except for in-corral mounding. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. The facility must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible.

- {4518} Permittee shall manage corrals such that the manure depth in the corral does not exceed twelve (12) inches at any time or point, except for in-corral mounding. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. However, permittee must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible. [District Rule 4570]
- {4519} Permittee shall measure and document the depth of manure in the corrals at least once every ninety (90) days. [District Rule 4570]

Solid Manure

Within 72 hours of removal from housing, either a) remove dry manure from the facility, or b) cover dry manure outside the housing with a weatherproof covering from October through May, except for times when wind events remove the covering, not to exceed 24 hours per event. Applicant has opted for the removal of dry manure within 72 hours, therefore the following condition will be applied to permit S-9647-4-0 to ensure compliance.

- Within seventy two (72) hours of removal of solid manure from housing, permittee shall remove dry manure from the facility. [District Rule 4570]

Liquid Manure

Allow liquid manure to stand in the fields for no more than twenty-four (24) hours after irrigation.

- {4550} Permittee shall not allow liquid manure to stand in the fields for more than twenty-four (24) hours after irrigation. [District Rule 4570]
- {4551} Permittee shall maintain records to demonstrate liquid manure did not stand in the fields for more than twenty-four (24) hours after irrigation. [District Rule 4570]

Liquid Manure Handling Mitigation Measures

Maintain lagoon pH between 6.5 and 7.5. Testing per Section 7.10 will be required.

- {4539} Permittee shall maintain lagoon pH between 6.5 and 7.5. [District Rule 4570]
- {4540} Permittee shall record and test lagoons for pH no later than six (6) months after the required date for implementation of the measure, and at least once every calendar quarter, with at least 30 days between monitoring tests thereafter unless the APCO, ARB, and EPA determines more frequent testing is required to demonstrate compliance with rule requirements. [District Rule 4570]

California Health & Safety Code 41700 (Health Risk Analysis)

Pursuant to the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, 3/2/01), for any sources with increases in toxic air emissions, the health risks resulting from such projects must be evaluated. This application is for existing emissions units with no increase in toxic air emissions; therefore, a health risk analysis is not required.

California Health & Safety Code 42301.6 (School Notice)

California Health & Safety Code 42301.6 requires that the District prepare a school notice prior to approving an application for a permit to construct or modify a source that emits toxic air emissions which is located within 1,000 feet from the outer boundary of a K-12 school site. This application is for an existing emissions unit that it not being constructed or modified; therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project qualifies for ministerial approval as an In-House-PTO due to a loss of permit exemption. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is project is exempt from the provisions of CEQA.

To ensure that issuance of this permit does not conflict with any conditions imposed by any local agency permit process, the following permit condition will be listed on each permit as follows:

- This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. *[District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act]*.

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project

proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The proposed project requires only ministerial approval, and is exempt from the provisions of CEQA. As such, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

VIII. Recommendation

Compliance with all applicable rules and regulations is expected.

Issue In-house Permit to Operate S-9647-1-0, -2-0, -3-0, and -4-0 subject to the permit conditions listed on the attached draft In-house Permit to Operate.

IX. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Fee
S-9647-1-0	3020-06	Cow Housing – Miscellaneous	\$128
S-9647-2-0	3020-06	Liquid Manure – Miscellaneous	\$128
S-9647-3-0	3020-06	Feed Storage and Handling – Miscellaneous	\$128
S-9647-4-0	3020-06	Solid Manure – Miscellaneous	\$128

Attachments:

- A: Draft Permits to Operate
- B: Emission Profile

Appendix A

Draft PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-9647-1-0

EXPIRATION DATE: 04/30/2022

EQUIPMENT DESCRIPTION:

CATTLE HOUSING - SCRAPE FEEDLOT WITH UP TO 8,240 TOTAL CATTLE CONSISTING OF UP TO 2,240 CATTLE AND UP TO 6,000 CALVES IN 18 OPEN CORRALS WITH AND WITHOUT SHADE

PERMIT UNIT REQUIREMENTS

1. {3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]
2. {3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]
3. {3658} This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [Public Resources Code 21000-21177: California Environmental Quality Act]
4. {4452} If a licensed veterinarian or a certified nutritionist determines that any VOC mitigation measure will be required to be suspended as a detriment to animal health or necessary for the animal to molt, the owners/operators must notify the District in writing within forty-eight (48) hours of the determination including the duration and the specific health condition requiring the mitigation measure to be suspended. If the situation is expected to exist longer than a thirty-day (30) period, the owner/operator shall submit a new emission mitigation plan designating a mitigation measure to be implemented in lieu of the suspended mitigation measure. [District Rule 4570]
5. {4626} Permittee shall implement at least one of the following corral mitigation measures: 1) slope the surface of the corrals at least 3% where the available space for each animal is 400 square feet or less and shall slope the surface of the corrals at least 1.5% where the available space for each animal is more than 400 square feet per animal; 2) maintain corrals to ensure proper drainage preventing water from standing more than forty-eight hours; or 3) harrow, rake, or scrape pens sufficiently to maintain a dry surface except during periods of rainy weather or when the corrals have not held animals in the last thirty days. [District Rule 4570]
6. {4671} The number of calves may exceed the value stated in the equipment description as long as the total support stock (heifers, bulls, and calves) does not exceed the combined value stated in the equipment description, and there is no increase in the number of hutches or corrals. [District Rule 2010]
7. {4617} Permittee shall scrape corrals, excluding the removal of in-corral mounds at least two (2) times per year with at least ninety (90) days between each cleaning. [District Rule 4570]
8. {4499} Permittee shall inspect water pipes and troughs and repair leaks at least once every seven (7) days. [District Rule 4570]
9. {4518} Permittee shall manage corrals such that the manure depth in the corral does not exceed twelve (12) inches at any time or point, except for in-corral mounding. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. However, permittee must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible. [District Rule 4570]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. {4449} Permittee shall maintain a record of the number of animals of each species and production group at the facility and shall maintain quarterly records of any changes to this information. [District Rule 4570]
11. {4519} Permittee shall measure and document the depth of manure in the corrals at least once every ninety (90) days. [District Rule 4570]
12. {4555} Permittee shall either 1) maintain sufficient records to demonstrate that corrals are maintained to ensure proper drainage preventing water from standing for more than forty-eight hours or 2) maintain records of dates pens are groomed (i.e., harrowed, raked, or scraped, etc.). [District Rule 4570]
13. {4500} Permittee shall maintain records demonstrating that water pipes and troughs are inspected and leaks are repaired at least once every seven (7) days. [District Rule 4570]
14. {4618} Permittee shall maintain records demonstrating that manure from corrals are cleaned at least two (2) times per year with at least ninety (90) days between each cleaning. [District Rule 4570]
15. {4453} Permittee shall keep and maintain all records for a minimum of five (5) years and shall make records available to the APCO and EPA upon request. [District Rule 4570]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-9647-2-0

EXPIRATION DATE: 04/30/2022

EQUIPMENT DESCRIPTION:

LIQUID MANURE HANDLING SYSTEM CONSISTING OF 2 STORAGE PONDS; MANURE IS LAND APPLIED THROUGH FLOOD IRRIGATION AND/OR HAULED OFFSITE

PERMIT UNIT REQUIREMENTS

1. {3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]
2. {3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]
3. {3658} This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [Public Resources Code 21000-21177: California Environmental Quality Act]
4. {4452} If a licensed veterinarian or a certified nutritionist determines that any VOC mitigation measure will be required to be suspended as a detriment to animal health or necessary for the animal to molt, the owners/operators must notify the District in writing within forty-eight (48) hours of the determination including the duration and the specific health condition requiring the mitigation measure to be suspended. If the situation is expected to exist longer than a thirty-day (30) period, the owner/operator shall submit a new emission mitigation plan designating a mitigation measure to be implemented in lieu of the suspended mitigation measure. [District Rule 4570]
5. Within seventy two (72) hours of removal of solid manure from housing, permittee shall remove dry manure from the facility. [District Rule 4570]
6. {4550} Permittee shall not allow liquid manure to stand in the fields for more than twenty-four (24) hours after irrigation. [District Rule 4570]
7. {4539} Permittee shall maintain lagoon pH between 6.5 and 7.5. [District Rule 4570]
8. {4540} Permittee shall record and test lagoons for pH no later than six (6) months after the required date for implementation of the measure, and at least once every calendar quarter, with at least 30 days between monitoring tests thereafter unless the APCO, ARB, and EPA determines more frequent testing is required to demonstrate compliance with rule requirements. [District Rule 4570]
9. {4551} Permittee shall maintain records to demonstrate liquid manure did not stand in the fields for more than twenty-four (24) hours after irrigation. [District Rule 4570]
10. {4453} Permittee shall keep and maintain all records for a minimum of five (5) years and shall make records available to the APCO and EPA upon request. [District Rule 4570]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-9647-3-0

EXPIRATION DATE: 04/30/2022

EQUIPMENT DESCRIPTION:

FEED STORAGE AND HANDLING CONSISTING OF COVERED FEED STORAGE OR COMMODITY BARN

PERMIT UNIT REQUIREMENTS

1. {3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]
2. {3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]
3. {3658} This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [Public Resources Code 21000-21177: California Environmental Quality Act]
4. {4452} If a licensed veterinarian or a certified nutritionist determines that any VOC mitigation measure will be required to be suspended as a detriment to animal health or necessary for the animal to molt, the owners/operators must notify the District in writing within forty-eight (48) hours of the determination including the duration and the specific health condition requiring the mitigation measure to be suspended. If the situation is expected to exist longer than a thirty-day (30) period, the owner/operator shall submit a new emission mitigation plan designating a mitigation measure to be implemented in lieu of the suspended mitigation measure. [District Rule 4570]
5. {4454} Permittee shall feed all animals according to National Research Council (NRC) guidelines. [District Rule 4570]
6. {4455} Permittee shall maintain records of feed content, formulation, and quantity of feed additive utilized, to demonstrate compliance with National Research Council (NRC) guidelines. Records such as feed company guaranteed analyses (feed tags), ration sheets, or feed purchase records may be used to meet this requirement. [District Rule 4570]
7. {4462} Permittee shall feed steam-flaked, dry rolled, cracked or ground corn or other steam-flaked, dry rolled, cracked or ground cereal grains. [District Rule 4570]
8. {4463} Permittee shall maintain records to demonstrate animals are fed steam-flaked, dry rolled, cracked or ground corn or other steam-flaked, dry rolled, cracked or ground cereal grains. Records such as feed company guaranteed analyses (feed tags), ration sheets, or feed purchase records may be used to meet this requirement. [District Rule 4570]
9. {4453} Permittee shall keep and maintain all records for a minimum of five (5) years and shall make records available to the APCO and EPA upon request. [District Rule 4570]

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: S-9647-4-0

EXPIRATION DATE: 04/30/2022

EQUIPMENT DESCRIPTION:

SOLID MANURE HANDLING CONSISTING OF SOLID MANURE APPLICATION TO LAND AND/OR HAULED OFFSITE

PERMIT UNIT REQUIREMENTS

1. {3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]
2. {3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]
3. {3658} This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [Public Resources Code 21000-21177: California Environmental Quality Act]
4. {4452} If a licensed veterinarian or a certified nutritionist determines that any VOC mitigation measure will be required to be suspended as a detriment to animal health or necessary for the animal to molt, the owners/operators must notify the District in writing within forty-eight (48) hours of the determination including the duration and the specific health condition requiring the mitigation measure to be suspended. If the situation is expected to exist longer than a thirty-day (30) period, the owner/operator shall submit a new emission mitigation plan designating a mitigation measure to be implemented in lieu of the suspended mitigation measure. [District Rule 4570]
5. Within seventy two (72) hours of removal of solid manure from housing, permittee shall remove dry manure from the facility. [District Rule 4570]
6. Permittee shall keep records of dates when manure is removed from the facility. [District Rule 4570]
7. {4453} Permittee shall keep and maintain all records for a minimum of five (5) years and shall make records available to the APCO and EPA upon request. [District Rule 4570]

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

Appendix B

Emissions Profile

Permit #: S-9647-1-0	Last Updated
Facility: PRIME CATTLE, LLC	11/23/2020 AGUIRRET

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	79680.0	0.0	16480.0
Daily Emis. Limit (lb/Day)	0.0	0.0	21.8	0.0	45.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	19920.0	0.0	4120.0
Q2:	0.0	0.0	19920.0	0.0	4120.0
Q3:	0.0	0.0	19920.0	0.0	4120.0
Q4:	0.0	0.0	19920.0	0.0	4120.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-9647-2-0	Last Updated
Facility: PRIME CATTLE, LLC	11/23/2020 AGUIRRET

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	1944.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	5.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	486.0
Q2:	0.0	0.0	0.0	0.0	486.0
Q3:	0.0	0.0	0.0	0.0	486.0
Q4:	0.0	0.0	0.0	0.0	486.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-9647-3-0	Last Updated
Facility: PRIME CATTLE, LLC	11/23/2020 AGUIRRET

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-9647-4-0	Last Updated
Facility: PRIME CATTLE, LLC	11/23/2020 AGUIRRET

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	6592.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	18.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	1648.0
Q2:	0.0	0.0	0.0	0.0	1648.0
Q3:	0.0	0.0	0.0	0.0	1648.0
Q4:	0.0	0.0	0.0	0.0	1648.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					