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C&H Sugar Company, Inc.

830 Loring Avenue
Crockett, CA 94525

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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

June 11, 2013

VIA Certified U.S. Mail #7005 1160 0004 5058 7610

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attention: Title V Reports

**Re: Semi-Annual Title V Monitoring Report
Plant #B1911
C&H Sugar Company, Inc.**

To Whom It May Concern:

In accordance with the Standard Conditions for Monitoring Reports (Section I.F) of the C&H Sugar Company's Title V Permit, this letter provides the semi-annual monitoring report for the period of December 1, 2012 through May 31, 2013.

Inspections

During the period described above, monthly inspections were conducted on the following dates:

- December 10, 20, 21, 27 and 30, 2012
- January 4, 9, 23, 30, and 31, 2013
- February 14, 20, and 26, 2013
- March 14, 21, and 22, 2013
- April 5, 9, 24, and 29, 2013
- May 3, 14, 15, 16, 20, and 24, 2013

The monthly inspections were conducted for the sources listed in Table 1 as requiring a monthly inspection frequency. Other than the following exceptions, there were no other notable instances of non-compliance during this period.

April 8, 2013

Notice of Violation (NOV) No. A52369 was issued on April 8, 2013 for Visible Emissions greater than Ringlemann #1 for greater than three minutes in an hour at the east end of

the raw sugar silo building. In accordance with the NOV requirements, a written response was provided to the BAAQMD within 10 day of issuance of the NOV. A brief summary of the immediate and long-term corrective actions taken is presented below.

At the time of the NOV, C&H was unloading abnormally dry sugar (i.e. low moisture content) from the ship which was transferred via conveyor belts into the raw sugar silo building.

We immediately stopped unloading raw sugar from the ship and subsequently installed water sprays at the raw sugar belt transfer points leading to the raw sugar silos. A "water cannon" was also installed at the top of the raw sugar silo to mitigate dust as the raw sugar was dropped into the silo, as necessary. In addition, personnel were positioned on the ship to spray water as necessary on the raw sugar still inside the cargo bay.

The application of water at various points in the ship unloading process was successful in mitigating the dust from the abnormally dry sugar cargo. No visible emissions were observed following the installation and use of the water spray equipment.

April 30, 2013

A water line restriction was found in supply line to rotoclone unit located at the top of the finished product silo (S-227, P-24). The equipment was subsequently shutdown, water was restored to the rotoclone unit, and the equipment was placed back in service. No visible emissions were observed after the repairs to the equipment were completed.

May 1, 2013

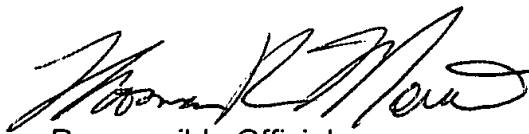
The water pressure actuator valve on the rotoclone equipment for Steel Silo B (S-258, P-55) was not operating fully and as such the rotoclone was shutdown. Inadvertently, the blower at the bottom of Steel Silo B was not also shutdown and an intermittent sugar dust visible emission was observed. The equipment was subsequently shutdown, applicable repairs were made, and the rotoclone equipment was placed back into service. No visible emissions were observed after the repairs to the equipment were completed.

Please note that some equipment remained shut down during this period e.g., S285 Mothers Dryer, S201 Warehouse Sugar Recovery System, Drivert Bauermeister Pulverizer #1 (a portion of S228), S223 Packing House No. 1 Vacuum System, and S307 Lime Loading Station. As required by the permit, when and if these units are put back into service, they will be inspected and operated according to the terms of the permit.

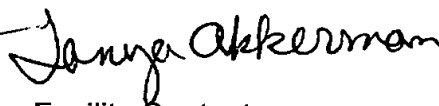
Certification

The undersigned certify that this document and all attachments are prepared under their direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on their inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information is, to the best of their knowledge and belief, true, accurate, and complete.

Sincerely,



Responsible Official
Kim Merritt – Refinery Manager
(kim.merritt@chsugar.com)



Facility Contact
Tanya Akkerman – Env. Compliance Manager
(tanya.akkerman@chsugar.com)

cc: Director of Air Division, US EPA, Attention: Air-3
(VIA Certified U.S. Mail #7005 1160 0004 5058 7627)

Encl.

Table 1 – C&H Sugar Company: Sources Requiring Inspections

Source	Frequency	Name
S201	M-BH	Warehouse Sugar Recovery System
S202	M-BH	PSS Vacuum Cleaning System
S203	M-BH	Powdered Carton Packaging Station
S204	M-BH	Powdered C/P Packaging Station
S205	M-BH	Powdered Bulk Pack Station
S206	M-BH	Mikro-Pulverizers (4 units)
S207	M-BH	Fondant Bulk-Packer
S208	M-BH	Pulverizer Bin and Conveyors
S209	M-BH	Pulverizer - Powdered, P1
S210	M-BH	Pulverizer - Powdered, P2
S211	M-BH	Pulverizer - Powdered, P3
S212	M-BH	Pulverizer - Powdered, P4
S213	M-BH	Pulverizer - Powdered, F1
S214	M-BH	Pulverizer - Powdered, F2
S215	A	Starch Unloading Facility
S216	A	Starch Conveying System
S217	A	Paper Baler, Bosch 12/5 Station
S218	M-BH, A-CY	Bosch 12/5 Packing Station, #1
S219	M-BH, A-CY	Bosch 12/5 Packing Station, #2
S220	M-BH, A-CY	Bosch 12/5 Packing Station, #3
S221	A	Melt Tank Bosch 12/5 Station
S222	M-BH, A-RC	Confectioners Dryer
S224	A-RC	Bulk Sugar Loading
S225	A-RC	Steel Silos Conveying to Bulk Loadout
S226	A-RC	Concrete Silos Conveying to Bulk Loadout
S227	A-RC	Concrete Silos Bulk Granulated System
S228	M-BH	Drivert Production
S229	A-CY	Scrap Paper Recovery
S230	A-RC	No. 1 Granulator (Upper/Lower)
S231	A-RC	No. 2 Granulator (Upper/Lower)
S232	A-RC	No. 3 Granulator (Upper/Lower)
S233	A-RC	No. 4 Granulator (Upper/Lower)
S234	A-RC	No. 5 Granulator (Upper/Lower)
S235	A-RC	No. 6 Granulator (Upper/Lower)
S236	A-RC	No. 7 Granulator (Upper/Lower)
S240	A-RC	Screened Sugar Distribution
S241	A-RC	Confectioners Sugar Distribution
S242	A-RC	Small Pack Distribution
S243	M-BH, A-RC	No. 1 Bemis Packer
S244	M-BH, A-RC	No. 2 Bemis Packer
S245	M-BH	No. 3 Bemis Packer
S246	M-BH	Supersack Storage Bin
S247	M-BH	Dry Unscreened Sugar Surge
S248	M-BH	Fines Collection
S249	M-BH	Coarse Collection
S250	M-Scr	Herreschoff Char Furnace, Natural Gas Fired
S252	A-RC	Bulk Bins #11-#15
S253	A-RC	Bulk Bins #6-#10
S254	A-RC	Bulk Bins #1-#5
S255	M-BH	Paper Shredder
S256	M-records	Paint Spray Booth
S257	A-RC	Bulk Granulated Silo A

Table 1 – C&H Sugar Company: Sources Requiring Inspections (p.2)

Source	Frequency	Name
S258	A-RC	Bulk Granulated Silo B
S259	A-RC	Bulk Granulated Silo C
S260	A-RC	Bulk Granulated Silo D
S261	A-RC	ELBA Sugar Conveying/Storage
S262	M-BH, A-RC	12/5 Sugar Conveying/Storage
S263	M-BH	Drivert Packer
S264	M-BH	Airveyor Bin
S265	M-BH	No. 2 Airveyor
S266	M-BH	No. 1 Airveyor
S267	M-BH	PSS Sugar Recovery
S268	A-RC, A-CY	No. 1 6/10 Hesser Packer
S269	A-RC, A-CY	No. 2 6/10 Hesser Packer
S271	M	Warehouse/PSS (Melt Tank (Dry Sugar))
S273	A-RC	Bulk Granulated Elevator - Elevator 1A
S274	A-RC	Bulk Granulated Elevator - Elevator 1
S275	A-RC	Bulk Granulated Elevator - Elevator 2
S276	A-RC	Custom Products Handling
S278	A-CY	Carpenter Shop Saw Dust
S279	M	Tailings Melt tank
S280	A-BH	Diatomaceous Earth Storage Silo
S281	A-BH	West DE Metering Bin
S282	A-BH	East DE Metering Bin
S284	A-BH	Lime Unloading Station
S285	M-BH	Mothers' Dryer (Bulk Sugar Cooler)
S286	M-Scr	Carbon Regeneration Furnace, Natural Gas Fired
S288	M	Spent Char Handling System
S289	M-BH	Regenerated Char Handling System
S301	M	Surge Basin
S303	M	(3) Aeration Basins
S304	M	(2) Clarifiers
S305	M	Chlorination/Dechlorination Basin
S307	A	Liming System for Filter Cake
S350	A	Emergency Standby Engine, Gasoline Fired
S351	A	Emergency Standby Engine, Gasoline Fired
S352	M-BH	Ropak Machine

A – Annual, M – Monthly, RC – Rotoclone, CY – Cyclone, BH – Baghouse, Scr - Scrubber