

RECEIVED

C&H Sugar, Inc. 830 Loring Ave. Crockett, CA 94525

Tanya Akkerman

Environmental Compliance Manager

December 19, 2012

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MANAGEMENT DISTRICT

VIA Certified U.S. Mail #7005 1160 0004 5058 7580

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

Re: Title V Monitoring Report – Plant #B1911/#17315

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 June 1, 2012 through November 30, 2012.

Inspections

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

- June 21 and 29, 2012
- July 19, 24, 26, and 31, 2012
- August 14,15, 16, 28, and 30, 2012
- September 12, 21, 26, and 30, 2012
- October 2, 3, 4, 9, 10, and 31, 2012
- November 2,8, 20, and 30, 2012

The monthly inspections were conducted for the sources listed in Table 1 as requiring a monthly inspection frequency. Annual inspections were conducted through 2012 on the various pieces of equipment when they were in operation.

On November 12, 2012, Ms. Tanya Akkerman notified the BAAQMD Odor Complaint Hotline (talked to Janice) that we were starting up a piece of equipment at the wastewater treatment plant and an odor may result. The piece of equipment (dissolved air floatation unit) had been out of service for approximately 5 weeks for repairs. Any potential odors were mitigated by operating the odor control system at the wastewater treatment plant. C&H Sugar Company and/or the wastewater treatment plant were not contacted by any residents in the Community regarding odors during this period.

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Semi-Annual Report

Director of Compliance and Enforcement Bay Area Air Quality Management District Plant #B1911 – C&H Sugar Company, Inc. December 19, 2012 Page 2

No other actions were required as a result of these inspections. During this reporting period, there were no notable instances of non-compliance.

Please note that some equipment remains shutdown indefinitely 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)

Encl.

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

| Source | Frequency | Name |
|--------------|------------|--|
| S201 | M-BH | |
| S201 | M-BH | Warehouse Sugar Recovery System |
| S202 S203 | M-BH | PSS Vacuum Cleaning System Powdered Carton Packaging Station |
| S203 S204 | M-BH | |
| S204 S205 | M-BH | Powdered C/P Packaging Station Powdered Bulk Pack Station |
| S203 | M-BH | Fondant Bulk-Packer |
| S207 S208 | | |
| | | 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 | Α | 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) |
| \$231 | 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 | М | Surge Basin |
| S303 | М | (3) Aeration Basins |
| S304 | M | (2) Clarifiers |
| S305 | M | Chlorination/Dechlorination Basin |
| S307 | Α | Liming System for Filter Cake |
| S350 | A | Emergency Standby Engine, Gas Fired |
| S351 | Α | Emergency Standby Engine, Gas Fired |
| S352 | Α | Ropak Machine |

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