



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

TV Tracking #: 737

June 29, 2023

1. RECEIVED IN ENFORCEMENT: 07/01/2023

VIA e-mail: compliance@baaqmd.gov

Attention: Title V Reports
Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

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

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, 2022 through May 31, 2023.

Inspections

During the period described above, monthly inspections and visible emission (VE) observations were documented on the following dates with exceptions, as noted:

- December 1, 5, and 12, 2022;
- January 2023
 - Exception – gauge readings and VE observations were not documented;
- February 23, 2023
 - Exception – gauge readings and/or VE observations were not documented for S-213, S-214, S218-220, S262, S263, S-228, S246-S249, S-250.
- March 2023
 - Exception – gauge readings and VE observations were not documented;
- April 4, 6, and 7, 2023
 - Exception – gauge readings and/or VE observations were not documented for S-213, S-214, S218-220, S262, S-266, S-250.
- May 2023
 - Exception – gauge readings and VE observations were not documented.

The 10-day Discovery of Title V Permit variance and 30-day Title V Deviation Report for the incomplete monthly inspections was submitted to BAAQMD on June 29, 2023.

Shutdown Equipment

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.

NOV issued for Failure to Meet Permit Condition

NOV A62065 was issued on December 14, 2022 by the BAAQMD to Mr. Cameron Williams for Failure to Meet Permit Condition (i.e. file multiple Title V Deviations). A cited occurrence date was not listed on the NOV.

The Title V Deviation reports were submitted to BAAQMD on June 29, 2023.

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
Hitesh Modgil –Refinery Manager
(Hitesh.modgil@asr-group.com)



Facility Contact
Peter Grasson – Sr. Regional EHS Manager
(peter.grasson@asr-group.com)

cc: Director of Enforcement Division, TRI & Air Section (ENF-2-1)
US EPA, Region 9 (VIA e-mail: r9.aeo@epa.gov)

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

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

Source	Frequency	Name
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
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
S316	M-BH	9 th floor Dust Collector

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