



JAN 13 2010

Mr. Tim Durham
Ingomar Packing
PO Box 1448
Los Banos, CA 93635

**Re: Notice of Preliminary Decision - ATC / Certificate of Conformity
Facility # N-1276
Project # N-1094036**

Dear Mr. Durham:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Ingomar Packing at 9950 Ingomar Grade in Los Banos, CA. The applications are for the installation of a new boiler and modifications to the fuel usage limits of the existing boilers.

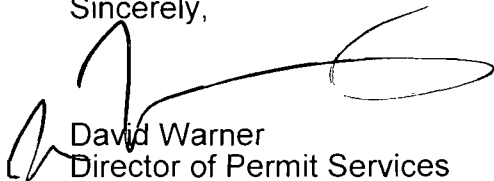
After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the Authorities to Construct will be issued to the facility with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

The public notice will be published approximately three days from the date of this letter. Please submit your written comments within the 30-day public comment period which begins on the date of publication of the public notice.

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

DW: MS/cm

Enclosures

Seyed Sadredin
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



HEALTHY AIR LIVING™

JAN 13 2010

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

Re: **Notice of Preliminary Decision - ATC / Certificate of Conformity**
Facility # N-1276
Project # N-1094036

Dear Mr. Tollstrup:

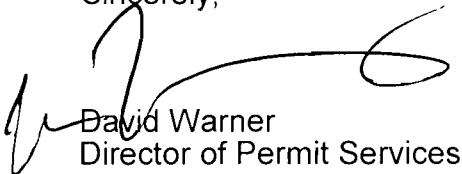
Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Ingomar Packing at 9950 Ingomar Grade in Los Banos, CA. The applications are for the installation of a new boiler and modifications to the fuel usage limits of the existing boilers.

The public notice will be published approximately three days from the date of this letter. Please submit your written comments within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

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JAN 13 2010

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Preliminary Decision - ATC / Certificate of Conformity
Facility # N-1276
Project # N-1094036**

Dear Mr. Rios:

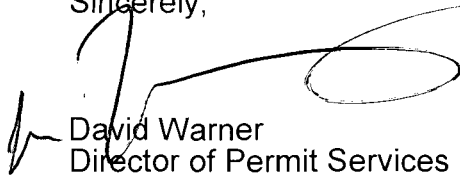
Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Ingomar Packing at 9950 Ingomar Grade in Los Banos, CA, which has been issued a Title V permit. Ingomar Packing is requesting that Certificates of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The applications are for the installation of a new boiler and modifications to the fuel usage limits of the existing boilers.

Enclosed is the engineering evaluation of this application, along with the current Title V permit, and proposed Authorities to Construct # N-1276-1-12, N-1276-2-13, N-1276-3-12, N-1276-8-6, N-1276-9-6, N-1276-15-3 and N-1276-18-0 with Certificates of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

DW: MS/cm

Enclosures

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Merced Sun Star

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
AUTHORITIES TO CONSTRUCT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of Authorities to Construct to Ingomar Packing for its tomato processing plant at 9950 Ingomar Grade in Los Banos, California. The applications are for the installation of a new boiler and modifications to the fuel usage limits of the existing boilers.

The analysis of the regulatory basis for these proposed actions, Project #N-1094036, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95366.**

Appendix A
Draft ATC's

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-1276-1-12

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY
MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

93 MMBTU/HR NEBRASKA MODEL NS-D-65 BOILER WITH A CSI LOW NOX BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTAK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION. MODIFICATION TO REDUCE THE NOX EMISSION LIMIT FROM 7 PPMVD @ 3% O2 TO 5 PPMVD @ 3% O2 AND TO INCREASE THE FACILITY-WIDE FUEL USAGE LIMIT TO 19,600 MMBTU PER DAY.

CONDITIONS

1. Authority to Construct N-1276-1-11 shall be implemented prior to the implementation of this Authority to Construct. [District Rule 2201]
2. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
3. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. 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. [District Rule 4101] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services

N-1276-1-12 : Jan 4 2010 4:32PM - SCHONHOM : Joint Inspection NOT Required

7. This boiler shall be equipped with a totalizing fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The unit shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The daily fuel usage of this unit shall not exceed 2,160 MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. NOx emissions shall not exceed 5 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. VOC emissions shall not exceed 0.00292 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM₁₀ emissions shall not exceed 0.00523 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Ammonia (NH₃) emissions from the exhaust stack shall not exceed 10 ppmvd @ 3% O₂ over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to determine compliance with the NOx, CO and ammonia emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
20. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
21. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
22. For NOx and CO emission source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
24. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4305 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

26. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
29. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Ammonia monitoring shall be conducted utilizing Draeger tubes or another District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 2520, 9.3.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. Ammonia emission readings shall be taken at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. If the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedence. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. NO_x, CO, O₂ and NH₃ emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO and O₂ analyzer as well as the ammonia emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the ammonia emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2520, 9.3.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
34. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
35. A record of the daily fuel usage of this unit, in Btu, shall be kept. [District Rules 2201 and 2520, 9.3.2 and 40 CFR 60.48(c)] Federally Enforceable Through Title V Permit
36. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
37. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
38. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit

39. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
40. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.3.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
41. {2807} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 405 (Madera), 408 and 409 (Kern), and 408 (all six remaining counties in the San Joaquin Valley); Rule 404 (Madera) 406 (Fresno), and 407 (all six remaining counties in the San Joaquin Valley); SJVUAPCD Rule 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. {2814} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 1081. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
44. {2815} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2., 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
45. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-1276-2-13

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

93 MMBTU/HR NEBRASKA MODEL NS-D-65 BOILER WITH A CSI LOW NOX BURNER, AND INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTAK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION. MODIFICATION TO REDUCE THE NOX LIMIT FROM 7 PPMVD @ 3% O2 TO 5 PPMVD @ 3% O2 AND TO INCREASE THE FACILITY-WIDE FUEL USAGE LIMIT TO 19,600 MMBTU PER DAY.

CONDITIONS

1. Authority to Construct N-1276-2-12 shall be implemented prior to the implementation of this Authority to Construct. [District Rule 2201]
2. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
3. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. 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. [District Rule 4101] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

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Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services

N-1276-2-13: Jan 4 2010 4:32PM - SCHONHOM : Joint Inspection NOT Required

7. This boiler shall be equipped with a totalizing fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
8. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
9. This unit shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This daily fuel usage of this unit shall not exceed 2,160 MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. NOx emissions shall not exceed 5 ppmvd @ 3% O2 (referenced as NO2) or 0.0062 lb/MMBtu. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
13. CO emissions shall not exceed 100 ppmvd @ 3% O2 or 0.074 lb/MMBtu. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
14. VOC emissions shall not exceed 0.0055 lb/MMBtu (referenced as methane). [District Rule 2201] Federally Enforceable Through Title V Permit
15. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Ammonia (NH3) emissions from the exhaust stack shall not exceed 10 ppmvd @ 3% O2 over a 15-minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Source testing to determine compliance with the NOx, CO and ammonia emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. For NOx and CO emission source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

25. Source testing to measure CO emissions shall be conducted using EPA Method 10 or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. Stack gas oxygen shall be determined using EPA Method 3 or 3A or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
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29. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃, and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Ammonia monitoring shall be conducted utilizing Draeger tubes or another District-approved equivalent method. Monitoring shall not be required if the unit is not in operation (i.e. the unit need not be started solely to perform monitoring). Monitoring shall be performed within five days of restarting the unit unless it has been performed within the last month. [District Rules 2201, 4102, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. Ammonia emission readings shall be taken at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. If the NO_x, CO, or NH₃ concentration, as measured by the portable analyzer or the District-approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than one hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after one hour of operation following detection, the permittee shall notify the District within the following one hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. All NO_x, CO, NH₃, and O₂ emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO, and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15-consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15-consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃; and O₂ measurements; (2) the O₂ concentration in percent by volume and the measured NO_x, CO, and NH₃ concentrations corrected to 3% O₂; (3) make and model of the portable analyzer; (4) portable analyzer calibration records; (5) the method of determining the NH₃ emission concentration; and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2520, 9.4.2, 4305, 4306 and 4320]
34. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
35. A record of the daily fuel usage of this unit, in Btu, shall be kept. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
37. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
38. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.N] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

39. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
40. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
41. {2807} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 405 (Madera), 408 and 409 (Kern), and 408 (all six remaining counties in the San Joaquin Valley); Rule 404 (Madera) 406 (Fresno), and 407 (all six remaining counties in the San Joaquin Valley); SJVUAPCD Rule 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. {2814} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 1081. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
44. {2815} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2., 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
45. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
46. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
47. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
48. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: N-1276-3-12

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

156 MMBTU/HR (130,000 LB STEAM/HR) NEBRASKA MODEL N25-T-84 BOILER WITH A TODD RMB ULTRA-LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM. MODIFICATION TO ELIMINATE PROPANE AS AN APPROVED FUEL AND TO INCREASE THE FACILITY-WIDE FUEL USAGE LIMIT TO 19,600 MMBTU PER DAY.

CONDITIONS

1. Authority to Construct N-1276-3-11 shall be implemented prior to the implementation of this Authority to Construct. [District Rule 2201]
2. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
3. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. 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. [District Rule 4101] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
N-1276-3-12: Jan 4 2010 4:32PM - SCHOENHOM : Joint Inspection NOT Required

8. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
9. This unit shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. NOx emissions shall not exceed 7 ppmvd @ 3% O2 (referenced as NO2) or 0.008 lb/MMBtu. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
12. CO emissions shall not exceed 100 ppmvd @ 3% O2 or 0.074 lb/MMBtu. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
13. VOC emissions shall not exceed 0.0055 lb/MMBtu (referenced as methane). [District Rule 2201] Federally Enforceable Through Title V Permit
14. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Source testing to determine compliance with the NOx and CO emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

26. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306 and 4320]
28. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320]
32. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
33. The records necessary to show the required tune-ups were conducted shall be kept. [District Rule 4320]
34. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
35. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
37. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit
38. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

39. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
40. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [District Rule 4001] Federally Enforceable Through Title V Permit
41. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
42. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
43. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
44. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
45. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: N-1276-8-6

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

182.5 MMBTU/HR ENGLISH MODEL 150-H-600 WATERTUBE BOILER EQUIPPED WITH A TODD/RADIAN RMB BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM. MODIFICATION TO INCREASE THE FACILITY-WIDE FUEL USAGE LIMIT TO 19,600 MMBTU PER DAY.

CONDITIONS

1. Authority to Construct N-1276-8-5 shall be implemented prior to the implementation of this Authority to Construct. [District Rule 2201]
2. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
3. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. 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. [District Rule 4101] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The unit shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services

N-1276-8-6: Jan 4 2010 4:32PM - SCHONHOM : Joint Inspection NOT Required

8. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
10. NOx emissions shall not exceed 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. VOC emissions shall not exceed 0.0004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. PM₁₀ emissions shall not exceed 0.0033 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Source testing to measure the NOx and CO emissions from this unit shall be conducted by July 10, 2010. [District Rule 4320] Federally Enforceable Through Title V Permit
16. Source testing to determine compliance with the NOx and CO emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
18. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. For NOx and CO emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
22. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
25. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

26. The flue gas recirculation valve(s) setting shall be monitored at least on a daily basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2520, 9.3.2, 4305, 4306, 4320 and 40 CFR part 64] Federally Enforceable Through Title V Permit
27. The flue gas recirculation valve(s) setting shall not be less than 68% at firing rates greater than 20% and less than 95%. [District Rules 2520, 9.3.2, 4305, 4306, 4320 and 40 CFR 60 part 64] Federally Enforceable Through Title V Permit
28. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 2520, 9.3.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
32. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
33. The records necessary to show the required tune-ups were conducted shall be kept. [District Rule 4320]
34. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
35. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
37. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit
38. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
39. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 40, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

40. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
41. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
42. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
43. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
44. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
45. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-1276-9-6

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

182.5 MMBTU/HR ENGLISH MODEL 150-H-600 WATERTUBE BOILER EQUIPPED WITH A TODD/RADIAN RMB BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM. MODIFICATION TO INCREASE THE FACILITY-WIDE FUEL USAGE LIMIT TO 19,600 MMBTU PER DAY AND TO LIMIT THE FUEL USAGE OF THIS UNIT TO 864,000 MMBTU PER ROLLING 12-MONTH PERIOD.

CONDITIONS

1. Authority to Construct N-1276-9-5 shall be implemented prior to the implementation of this Authority to Construct. [District Rule 2201]
2. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
3. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. 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. [District Rule 4101] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services
N-1276-9-6; Jan 4 2010 4:32PM - SCHONHOM : Joint Inspection NOT Required

7. The boiler shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The heat input into this unit shall not exceed 864,000 MMBtu during any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
11. NO_x emissions shall not exceed 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. VOC emissions shall not exceed 0.0004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM₁₀ emissions shall not exceed 0.0033 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Source testing to determine compliance with the NO_x and CO emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
18. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
22. Source testing to measure NO_x emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

25. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. The flue gas recirculation valve(s) setting shall be monitored at least on a daily basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2520, 9.3.2, 4305, 4306, 4320 and 40 CFR part 64] Federally Enforceable Through Title V Permit
27. The flue gas recirculation valve(s) setting shall not be less than 73% at firing rates greater than 27% and less than 95%. [District Rules 2520, 9.3.2, 4305, 4306, 4320 and 40 CFR 60 part 64] Federally Enforceable Through Title V Permit
28. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 2520, 9.3.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
32. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
33. The records necessary to show the required tune-ups were conducted shall be kept. [District Rule 4320]
34. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
35. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
36. A record of the fuel usage of this unit, on a 12 month rolling total basis, shall be kept. The record shall be updated at least once every calendar month. [District Rule 2201] Federally Enforceable Through Title V Permit
37. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
38. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

39. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
40. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
41. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
42. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
43. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
44. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
45. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
46. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-1276-15-3

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY
MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

98 MMBTU/HR NATURAL GAS-FIRED NEBRASKA MODEL NS-F/S 68 BOILER EQUIPPED WITH A TODD VARI-FLAME MODEL #V8151G0XXX LOW NOX BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTACK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION. MODIFICATION TO REDUCE THE NOX LIMIT FROM 7 PPMVD @ 3% O2 TO 5 PPMVD @ 3% O2, INCREASE THE FACILITY-WIDE FUEL USAGE LIMIT TO 19,600 MMBTU PER DAY AND TO LIMIT THE FUEL USAGE OF THIS UNIT TO 200,000 MMBTU PER ROLLING 12-MONTH PERIOD.

CONDITIONS

1. Authority to Construct N-1276-15-2 shall be implemented prior to the implementation of this Authority to Construct. [District Rule 2201]
2. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
3. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. 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. [District Rule 4101] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Sayed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services
N-1276-15-3; Jan 4 2010 4:32PM - SCHONHOM : Joint Inspection NOT Required

6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The unit shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The heat input into this unit shall not exceed 200,000 MMBtu during any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
11. NO_x emissions shall not exceed 5 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. CO emissions shall not exceed 50 ppmvd @ 3% O₂ or 0.037 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM₁₀ emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Ammonia (NH₃) emissions shall not exceed 10 ppmvd @ 3% O₂ over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to determine compliance with the NO_x, CO and ammonia emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. For NO_x and CO emission source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with that limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Source testing to measure NO_x emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
26. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
28. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Ammonia monitoring shall be conducted utilizing Dreager tubes or another District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. Ammonia emission readings shall be taken at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. If the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the NH₃ monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. NO_x, CO, O₂ and NH₃ emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
34. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
35. A record of the fuel usage of this unit, on a 12 month rolling total basis, shall be kept. The record shall be updated at least once every calendar month. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
37. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.N] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

38. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
39. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
40. This unit is subject to the requirements of 40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-1276-18-0

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

180 MMBTU/HR NATURAL GAS FIRED NEBRASKA MODEL 500D-100 BOILER EQUIPPED WITH A JOHN ZINK VARIFLAME BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A HALDOR TOPSOE SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. 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. [District Rule 4101] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The boiler shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
N-1276-18-0: Jan 4 2010 4:32PM - SCHOINHOM : Joint Inspection NOT Required

8. The heat input into this unit shall not exceed 475,000 MMBtu during any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
9. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The combined start-up duration shall not exceed 0.5 hour during any one day and shall not exceed 20 hours per calendar year. [District Rules 2201, 4305, 4306 and 4320]
11. NOx emissions during non-start-up periods shall not exceed 5 ppmvd @ 3% O2 or 0.0062 lb/MMBtu referenced as NO2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. NOx emissions during start-up periods shall not exceed 40 ppmvd @ 3% O2 or 0.048 lb/MMBtu referenced as NO2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. CO emissions during non-start-up periods shall not exceed 100 ppmvd @ 3% O2 or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. CO emissions during start-up periods shall not exceed 400 ppmvd @ 3% O2 or 0.3 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. VOC emissions shall not exceed 0.004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Ammonia (NH3) emissions shall not exceed 10 ppmvd @ 3% O2 over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Initial modeling, to determine the predictive emission monitoring system parameter ranges that indicate compliance with the NOx emission limits of this permit shall be conducted within 60 days after initial start-up. [District Rule 4001 and 40 CFR Part 60 Subpart Db] Federally Enforceable Through Title V Permit
20. Acceptable ranges shall be determined for FGR rate, stack O2 content and SCR system ammonia injection rate and they shall be determined for the entire operating range of the unit (broken up into five equal ranges). Separate modeling shall be conducted for each range. [District Rule 4001 and 40 CFR Part 60 Subpart Db] Federally Enforceable Through Title V Permit
21. Initial source testing to determine compliance with the NOx, CO and ammonia emission limits of this permit shall be conducted within 60 days after initial start-up. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. Source testing to determine compliance with the NOx, CO and ammonia emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
28. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
33. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
34. The records necessary to show the required tune-ups were conducted shall be kept. [District Rule 4320]
35. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
36. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
37. A record of the fuel usage of this unit, on a 12 month rolling total basis shall be kept. The record shall be updated at least once every calendar month. [District Rule 2201] Federally Enforceable Through Title V Permit
38. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
39. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit
40. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
41. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
42. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
43. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

44. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
45. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
46. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
47. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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Appendix B
Current PTO's

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-1276-1-11

ISSUANCE DATE: 08/18/2009

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

93 MMBTU/HR NEBRASKA MODEL NS-D-65 BOILER WITH A CSI LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM. MODIFICATION TO LIMIT THE NOX EMISSIONS TO 7 PPMVD @ 3% O2 FOR RULE 4320 COMPLIANCE.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} 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. [District Rule 4101]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. This boiler shall be equipped with a totalizing fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
N-1276-1-11 : Dec 24 2009 1:38PM -SCHONHOM : Joint Inspection NOT Required

8. The daily fuel usage of this unit shall not exceed 2,160 MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
9. NO_x emissions shall not exceed 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320]
10. CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
11. VOC emissions shall not exceed 0.00292 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM₁₀ emissions shall not exceed 0.00523 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Ammonia (NH₃) emissions from the exhaust stack shall not exceed 10 ppmvd @ 3% O₂ over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The facility-wide fuel usage shall not exceed 15,546.7 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. This unit shall be tested for compliance with the NO_x, CO and NH₃ emissions limits of this permit at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
20. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
21. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
22. For NO_x and CO emission source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
24. Source testing to measure NO_x emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4305 and 4320]
26. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

28. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
29. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Ammonia monitoring shall be conducted utilizing Draeger tubes or another District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 2520, 9.3.2, 4305, 4306 and 4320]
30. Ammonia emission readings shall be conducted at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 4305, 4306 and 4320]
31. If the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1-hour and conduct a certified source test within 60 days of the first exceedence. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
32. NO_x, CO, O₂ and NH₃ emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO and O₂ analyzer as well as the ammonia emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320]
33. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the ammonia emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2520, 9.3.2, 4305, 4306 and 4320]
34. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320]
35. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320]
36. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320]
37. A record of the daily fuel usage of this unit, in Btu, shall be kept. [District Rules 2201 and 2520, 9.3.2 and 40 CFR 60.48(c)]
38. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
39. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1]

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CONDITIONS CONTINUE ON NEXT PAGE

40. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320]
41. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
42. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.3.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
43. {2807} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 405 (Madera), 408 and 409 (Kern), and 408 (all six remaining counties in the San Joaquin Valley); Rule 404 (Madera) 406 (Fresno), and 407 (all six remaining counties in the San Joaquin Valley); SJVUAPCD Rule 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
44. {2814} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
45. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 1081. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
46. {2815} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2,, 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-1276-2-12

ISSUANCE DATE: 08/18/2009

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

93 MMBTU/HR NEBRASKA MODEL NS-D-65 BOILER WITH A CSI LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM. MODIFICATION TO LIMIT THE NOX EMISSIONS TO 7 PPMVD @ 3% O2 FOR RULE 4320 COMPLIANCE.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} 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. [District Rule 4101]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. This boiler shall be equipped with a totalizing fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
7. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
N-1276-2-12 : Dec 24 2009 1:38PM - SCHOINHOM : Joint Inspection NOT Required

8. This boiler shall be fired on PUC-regulated natural gas or propane only. [District Rule 2201] Federally Enforceable Through Title V Permit
9. This daily fuel usage of this unit shall not exceed 2,160 MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. NOx emissions shall not exceed 7 ppmvd @ 3% O2 (referenced as NO2) or 0.008 lb/MMBtu. [District Rules 2201, 4306 and 4320]
11. CO emissions shall not exceed 100 ppmvd @ 3% O2 or 0.074 lb/MMBtu. [District Rules 2201, 4306 and 4320]
12. VOC emissions shall not exceed 0.0055 lb/MMBtu (referenced as methane). [District Rule 2201] Federally Enforceable Through Title V Permit
13. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Ammonia (NH3) emissions from the exhaust stack shall not exceed 10 ppmvd @ 3% O2 over a 15-minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The facility-wide fuel usage shall not exceed 15,546.7 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. This unit shall be tested for compliance with the NOx, CO and NH3 emissions limits of this permit at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
19. Source testing shall be required for propane fuel only if the unit uses more than 102,762 cumulative gallons during the preceding annual or 36-month source-testing interval. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
22. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
23. For NOx and CO emission source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320]
26. Source testing to measure CO emissions shall be conducted using EPA Method 10 or CARB Method 100. [District Rules 4305, 4306 and 4320]

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27. Stack gas oxygen shall be determined using EPA Method 3 or 3A or CARB Method 100. [District Rules 4305, 4306 and 4320]
28. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320]
29. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
30. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃, and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Ammonia monitoring shall be conducted utilizing Draeger tubes or another District-approved equivalent method. Monitoring shall not be required if the unit is not in operation (i.e. the unit need not be started solely to perform monitoring). Monitoring shall be performed within five days of restarting the unit unless it has been performed within the last month. [District Rules 2201, 4102, 4305, 4306 and 4320]
31. Ammonia emission readings shall be taken at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 4305, 4306 and 4320]
32. If the NO_x, CO, or NH₃ concentration, as measured by the portable analyzer or the District-approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than one hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after one hour of operation following detection, the permittee shall notify the District within the following one hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
33. All NO_x, CO, NH₃, and O₂ emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO, and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15-consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15-consecutive-minute period. [District Rules 4305, 4306 and 4320]
34. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃, and O₂ measurements; (2) the O₂ concentration in percent by volume and the measured NO_x, CO, and NH₃ concentrations corrected to 3% O₂; (3) make and model of the portable analyzer; (4) portable analyzer calibration records; (5) the method of determining the NH₃ emission concentration; and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2520, 9.4.2, 4305, 4306 and 4320]
35. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4320]
36. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320]
37. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320]
38. A record of the daily fuel usage of this unit, in Btu, shall be kept. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

40. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
41. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320]
42. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
43. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320]
44. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit
45. {2807} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 405 (Madera), 408 and 409 (Kern), and 408 (all six remaining counties in the San Joaquin Valley); Rule 404 (Madera) 406 (Fresno), and 407 (all six remaining counties in the San Joaquin Valley); SJVUAPCD Rule 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
46. {2814} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 1081. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. {2815} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2,, 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
49. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
50. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
51. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
52. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

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PERMIT NO: N-1276-3-11

ISSUANCE DATE: 08/18/2009

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

156 MMBTU/HR (130,000 LB STEAM/HR) NEBRASKA MODEL N25-T-84 BOILER WITH A TODD VARIFLAME BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM. MODIFICATION TO LIMIT THE NOX EMISSIONS TO 7 PPMVD @ 3% O2 FOR RULE 4320 COMPLIANCE.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} 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. [District Rule 4101]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
7. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
N-1276-3-11: Dec 24 2008 1:38PM - SCHOHOM - Joint Inspection NOT Required

8. This boiler shall be fired on PUC-regulated natural gas or LPG only. [District Rule 2201] Federally Enforceable Through Title V Permit
9. This boiler shall be equipped with a totalizing fuel flow meter that measures the quantity of LPG consumed per day (in gallons). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
10. NO_x emissions shall not exceed 7 ppmvd @ 3% O₂ (referenced as NO₂) or 0.008 lb/MMBtu. [District Rules 2201, 4306 and 4320]
11. CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rules 2201, 4306 and 4320]
12. VOC emissions shall not exceed 0.0055 lb/MMBtu (referenced as methane). [District Rule 2201] Federally Enforceable Through Title V Permit
13. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. PM₁₀ emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The facility-wide fuel usage shall not exceed 15,546.7 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. This unit shall be tested for compliance with the NO_x and CO emissions limits of this permit at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
18. Source testing shall be required for LPG fuel only if the unit uses more than 172,375 cumulative gallons during the preceding annual or 36-month source-testing interval. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
21. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Source testing to measure NO_x emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320]
25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
26. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]

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CONDITIONS CONTINUE ON NEXT PAGE

27. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320]
28. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306 and 4320]
29. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306 and 4320]
30. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 4320]
31. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
32. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305, 4306 and 4320]
33. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320]
34. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320]
35. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rule 4306 and 4320]
36. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1]
37. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
38. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320]
39. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
40. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320]

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41. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [District Rule 4001] Federally Enforceable Through Title V Permit
42. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
43. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001]
44. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
45. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
46. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

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PERMIT NO: N-1276-8-5

ISSUANCE DATE: 08/18/2009

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BAÑOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

182.5 MMBTU/HR ENGLISH MODEL 150-H-600 WATERTUBE BOILER EQUIPPED WITH A TODD/RADIAN RMB BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM. MODIFICATION TO LIMIT THE NOX EMISSIONS TO 7 PPMVD @ 3% O2 FOR RULE 4320 COMPLIANCE.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} 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. [District Rule 4101]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The boiler shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

N-1276-8-5: Dec 24 2009 1:38PM - SCHONHOM : Joint Inspection NOT Required

8. NOx emissions shall not exceed 7 ppmvd @ 3% O2 or 0.008 lb/MMBtu referenced as NO2. [District Rules 2201, 4305, 4306 and 4320]
9. CO emissions shall not exceed 100 ppmvd @ 3% O2 or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
10. VOC emissions shall not exceed 0.0004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. PM10 emissions shall not exceed 0.0033 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The facility-wide fuel usage shall not exceed 15,546.7 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Source testing to measure the natural-gas-combustion NOx and CO emissions from this unit shall be conducted by July 10, 2010. [District Rule 4320]
16. Source testing to measure natural-gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
18. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. For NOx and CO emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
22. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320]
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
24. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
25. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320]

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CONDITIONS CONTINUE ON NEXT PAGE

26. The flue gas recirculation valve(s) setting shall be monitored at least on a daily basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2520, 9.3.2, 4305, 4306, 4320 and 40 CFR part 64]
27. The flue gas recirculation valve(s) setting shall not be less than 68% at firing rates greater than 20% and less than 95%. [District Rules 2520, 9.3.2, 4305, 4306, 4320 and 40 CFR 60 part 64]
28. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 4320]
29. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
30. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 2520, 9.3.2, 4305, 4306 and 4320]
31. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320]
32. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320]
33. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320]
34. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1]
35. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
36. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320]
37. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
38. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, 4305, 4306 and 4320]
39. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

40. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
41. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001]
42. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
43. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
44. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1276-9-5

ISSUANCE DATE: 08/18/2009

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

182.5 MMBTU/HR ENGLISH MODEL 150-H-600 WATERTUBE BOILER EQUIPPED WITH A TODD/RADIAN RMB BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM. MODIFICATION TO LIMIT THE NOX EMISSIONS TO 7 PPMVD @ 3% O2 FOR RULE 4320 COMPLIANCE.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} 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. [District Rule 4101]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The boiler shall be fired only on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services
N-1276-9-5 : Dec 24 2009 1:38PM - 6CHONHOM : Joint Inspection NOT Required

8. NO_x emissions shall not exceed 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320]
9. CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
10. VOC emissions shall not exceed 0.0004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. PM₁₀ emissions shall not exceed 0.0033 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The facility-wide fuel usage shall not exceed 15,546.7 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
17. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
21. Source testing to measure NO_x emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320]
22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
23. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
24. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320]
25. The flue gas recirculation valve(s) setting shall be monitored at least on a daily basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2520, 9.3.2, 4305, 4306, 4320 and 40 CFR part 64]
26. The flue gas recirculation valve(s) setting shall not be less than 73% at firing rates greater than 27% and less than 95%. [District Rules 2520, 9.3.2, 4305, 4306, 4320 and 40 CFR 60 part 64]

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CONDITIONS CONTINUE ON NEXT PAGE

27. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 4320]
28. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
29. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 2520, 9.3.2, 4305, 4306 and 4320]
30. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320]
31. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320]
32. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320]
33. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2, and 4351, 6.1.1]
34. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
35. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320]
36. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
37. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, 4305, 4306 and 4320]
38. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
39. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
40. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001]
41. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
42. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

43. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-1276-15-2

ISSUANCE DATE: 08/18/2009

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

98 MMBTU/HR NATURAL GAS-FIRED NEBRASKA MODEL NS-F/S 68 BOILER EQUIPPED WITH A TODD VARI-FLAME MODEL #V8151G0XXX LOW NOX BURNER, INDUCED FLUE GAS RECIRCULATION AND A CRI CATASTACK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION. MODIFICATION TO LIMIT THE NOX EMISSIONS TO 7 PPMVD @ 3% O2 FOR RULE 4320 COMPLIANCE.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} 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. [District Rule 4101]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The heat input into the unit shall not exceed 140,430.147 MMBtu per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
N-1276-15-2 : Dec 24 2009 1:38PM - SCHONHOM : Joint Inspection NOT Required

8. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
9. NO_x emissions shall not exceed 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320]
10. CO emissions shall not exceed 50 ppmvd @ 3% O₂ or 0.037 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
11. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM₁₀ emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Ammonia (NH₃) emissions shall not exceed 10 ppmvd @ 3% O₂ over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The facility-wide fuel usage shall not exceed 15,546.7 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. This unit shall be tested for compliance with the NO_x, CO and NH₃ emissions limits of this permit within 60 days after initial start-up and at least once every twelve months thereafter. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 4305, 4306 and 4320]
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
21. For NO_x and CO emission source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with that limit. [District Rules 4305, 4306 and 4320]
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Source testing to measure NO_x emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320]
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
26. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320]
27. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081]

CONDITIONS CONTINUE ON NEXT PAGE

28. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Ammonia monitoring shall be conducted utilizing Dreager tubes or another District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 4305, 4306 and 4320]
29. Ammonia emission readings shall be conducted at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 4305, 4306 and 4320]
30. If the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the NH₃ monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
31. NO_x, CO, O₂ and NH₃ emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period [District Rules 4305, 4306 and 4320]
32. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320]
33. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4320]
34. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rule 4306 and 4320]
35. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1]
36. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
37. A records of the cumulative annual heat input into this unit, in Btu, shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
38. On and after July 10, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement provided they establish the fuel parameters mentioned above. [District Rule 4320]
39. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
40. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

41. This unit is subject to the requirements of 40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit

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Appendix C
RMR and Ambient Air Quality Analysis Summaries

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Mark Schonhoff, AQE – Permit Services
 From: Trevor Joy, AQS – Technical Services
 Date: December 17, 2009
 Facility Name: Ingomar Packing
 Location: 9950 Ingomar Grade in Los Banos
 Application #(s): N-1276-15-3 and 18-0
 Project #: 1094036

A. RMR SUMMARY

RMR Summary			
Categories	NG Boilers (Units 15-3 and 18-0)	Project Totals	Facility Totals
Prioritization Score	0.0	0.0	>1
Acute Hazard Index	0.00	0.00	0.18
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk (E-6)	0.0	0.0	0.4
T-BACT Required?	No		
Special Permit Conditions?	No		

B. RMR REPORT

I. Project Description

Technical Services received a request on December 14, 2009 to perform a Risk Management Review and an Ambient Air Quality Analysis for the proposed: yearly increase of NG for unit 15-3, installation of a natural gas boiler (unit 18-0), and the facility increase in yearly CO emissions.

II. Analysis

Toxic emissions for the project were calculated using Ventura County emission factors for natural gas external combustion. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905, March 2, 2001), risks from the proposed unit's toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEARTs database. The prioritization score for the facility was greater than 1.0 (see RMR Summary Table). Therefore, a refined analysis was required and performed. AERMOD was used, with the parameters outlined below and meteorological data for Los Banos 2004 to 2008, to determine the maximum dispersion factor at the nearest residential and business receptors.

These dispersion factors were input into the HARP model to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

For the AAQA, Technical Services used the AERMOD model to determine concentrations (acute and chronic).

The following parameters were used for the review:

Analysis Parameters Unit 15-3			
Source Type	Point	Location Type	Rural
Stack Diameter (m)	1.22	Closest Receptor (m)	762
Stack Height (m)	7.6	Stack Gas Velocity (acfm)	28,100
Stack Gas Temperature (F)	326	Increase in NG (MMscf/hr)	0.0
Increase in NG (MMscf/yr)	59.57	Ammonia (lbs/hr)	0.0
Ammonia (lbs/yr)	267		

Analysis Parameters Unit 18-0			
Source Type	Point	Location Type	Rural
Stack Diameter (m)	1.53	Closest Receptor (m)	762
Stack Height (m)	10.7	Stack Gas Velocity (acfm)	62,216
Stack Gas Temperature (F)	355	Increase in NG (MMscf/hr)	0.18
Increase in NG (MMscf/yr)	475	Ammonia (lbs/hr)	0.8
Ammonia (lbs/yr)	2,127		

Technical Services also performed modeling for criteria pollutants CO, NO_x, SO_x, and PM₁₀; as well as the RMR. The emission rates used for criteria pollutant modeling were:

For unit 15-3 0.0 lbs/hr and 117 lbs/yr NO_x, 0.0 lbs/hr CO, 0.0 lbs/hr and 170 lbs/yr Sox, and 0.0 lbs/hr and 453 lbs/yr PM₁₀.

For unit 18-0 1.1 lbs/hr and 3,095 lbs/yr NO_x, 54.0 lbs/hr CO, 0.5 lbs/hr and 1,354 lbs/yr Sox, and 1.4 lbs/hr and 3,610 lbs/yr PM₁₀.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*
Values are in µg/m³

Natural Gas RTO	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	Pass	X	Pass	X	X
NO _x	Pass	X	X	X	Pass
SO _x	Pass	Pass	X	Pass	Pass
PM ₁₀	X	X	X	Pass	Pass

*Results were taken from the attached PSD spreadsheets.

¹The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

III. Conclusion

The acute and chronic hazard indices were below 1.0; and the cancer risk is less than or equal to 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Attachments:

- A. RMR request from the project engineer
- B. Prioritization score with toxic emissions summary
- C. HARP Risk Report

**Appendix D
Top-Down BACT Analysis
(N-1276-18-0)**

[Per » B A C T » Bact Guideline.asp?category Level1=1&category Level2=1&category Level3=2&last Update=3 » 14 :](#)

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**Best Available Control Technology (BACT) Guideline 1.1.2
Last Update: 3/14/2002**

Boiler: > 20.0 MMBtu/hr, Natural gas fired, base-loaded or with small load swings.**

Pollutant	Achieved in Practice or in the SIP	Technologically Feasible	Alternate Basic Equipment
CO	Natural gas fuel with LPG backup		
NOx	9.0 ppmvd @ 3% O ₂ (0.0108 lb/MMBtu/hr) Ultra-Low NOx main burner system burner system and a natural gas or LPG fired igniter system (if the igniter system is used to heat the boiler at low fire).	9.0 ppmvd @ 3% O ₂ (0.0108 lb/MMBtu/hr) Selective Catalytic Reduction, Low Temperature Oxidizer, or equal and a < 30 ppmv NOx@ 3% O ₂ igniter system (if the igniter system is used to heat the boiler at low fire).	
PM10	Natural gas fuel with LPG backup		
SO	Natural gas fuel with LPG backup		
VOC	Natural gas fuel with LPG backup		

*** For the purpose of this determination, "small load swings" are defined as normal operational load fluctuations which are within the operational response range of an Ultra-Low NOx burner system(s).*

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

This is a Summary Page for this Class of Source - Permit Specific BACT Determinations on Details Page.

BACT guideline 1.1.2 applies to the proposed unit (N-1276-18-0).

NOx:

The current District BACT policy states that if an applicable guideline is included in the BACT Clearinghouse, then information from that guideline should be utilized without further analysis. However, this guideline does not properly reflect the new NOx requirements of District Rule 4320. It is currently District practice to consider 7 ppmvd NOx @ 3% O₂ as the Achieved-in-Practice level and 5 ppmvd NOx @ 3% O₂ as the Technologically Feasible level.

CO, VOC, SOx and PM10:

Guideline 1.1.2 still applies, as currently written, to these pollutants. Therefore, in accordance with the current District BACT policy, information from that guideline will be utilized without further analysis.

BACT analysis for NOx:

NOx emissions are generated by the burning of fuel.

Step 1 - Identify All Possible Control Technologies

7 ppmvd NOx @ 3% O₂ or 0.008 lb/MMBtu

5 ppmvd NOx @ 3% O₂ or 0.0062 lb/MMBtu

Step 2 - Eliminate Technologically Infeasible Options

The above listed emission levels are technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. 7 ppmvd NOx @ 3% O₂ or 0.008 lb/MMBtu.

2. 5 ppmvd NOx @ 3% O₂ or 0.0062 lb/MMBtu

Step 4 - Cost Effectiveness Analysis:

The applicant has proposed to meet the most stringent NOx level. Therefore, a cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for NOx will be a NOx emission level of 5 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu.

BACT analysis for CO:

CO is generated by partial combustion of the fuel.

Step 1 - Identify All Possible Control Technologies

1. Natural gas fuel with LPG back up

Step 2 - Eliminate Technologically Infeasible Options:

The above listed control technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. Natural gas fuel with LPG back up

Step 4 - Cost Effectiveness Analysis:

The above listed item is achieved in practice and is required regardless of cost. A cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for CO will be natural gas fuel with LPG back up. The applicant is proposing the use of natural gas fuel, therefore, BACT will be satisfied.

BACT analysis for VOC:

VOC emissions are generated by the burning of fuel.

Step 1 - Identify All Possible Control Technologies

1. Natural gas fuel with LPG back up

Step 2 - Eliminate Technologically Infeasible Options:

The above listed control technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. Natural gas fuel with LPG back up

Step 4 - Cost Effectiveness Analysis:

The above listed item is achieved in practice and is required regardless of cost. A cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for VOC will be natural gas fuel with LPG back up. The applicant is proposing the use of natural gas fuel, therefore, BACT will be satisfied.

BACT analysis for SOx:

VOC emissions are generated by the burning of fuel.

Step 1 - Identify All Possible Control Technologies

1. Natural gas fuel with LPG back up

Step 2 - Eliminate Technologically Infeasible Options:

The above listed control technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. Natural gas fuel with LPG back up

Step 4 - Cost Effectiveness Analysis:

The above listed item is achieved in practice and is required regardless of cost. A cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for SOx will be natural gas fuel with LPG back up. The applicant is proposing the use of natural gas fuel, therefore, BACT will be satisfied.

BACT analysis for PM10:

VOC emissions are generated by the burning of fuel.

Step 1 - Identify All Possible Control Technologies

1. Natural gas fuel with LPG back up

Step 2 - Eliminate Technologically Infeasible Options:

The above listed control technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. Natural gas fuel with LPG back up

Step 4 - Cost Effectiveness Analysis:

The above listed item is achieved in practice and is required regardless of cost. A cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for PM10 will be natural gas fuel with LPG back up. The applicant is proposing the use of natural gas fuel, therefore, BACT will be satisfied.

Authority to Construct Application Review

Facility Name: Ingomar Packing Company
Mailing Address: PO Box 1448
Los Banos, CA 93635

Date: January 4, 2010

Contact Person: Tim Durham
Telephone: (209) 826-9494 X 105

Engineer: Mark Schonhoff
Application #: N-1276-1-12
N-1276-2-13
N-1276-3-12
N-1276-8-6
N-1276-9-6
N-1276-15-3
N-1276-18-0
Project #: N-1094036

Deemed Complete: November 4, 2009

I. Proposal

N-1276-1-12:

The applicant is proposing to receive an Authority to Construct permit to reduce the NOx emission limit from 7 ppmvd to 5 ppmvd (both @ 3% O₂) and is proposing to increase the facility-wide fuel usage limit from 15,546.7 MMBtu/day to 19,600 MMBtu/day.

N-1276-2-13:

The applicant is proposing to receive an Authority to Construct permit to eliminate propane as an approved fuel, to reduce the NOx emission limit from 7 ppmvd to 5 ppmvd (both @ 3% O₂) and is proposing to increase the facility-wide fuel usage limit from 15,546.7 MMBtu/day to 19,600 MMBtu/day.

N-1276-3-12:

The applicant is proposing to receive an Authority to Construct permit to eliminate propane as an approved fuel, limit the annual fuel usage of this unit to 1,063,560 MMBtu and increase the facility-wide fuel usage limit from 15,546.7 MMBtu/day to 19,600 MMBtu/day.

N-1276-8-6:

The applicant is proposing to receive an Authority to Construct permit to increase the facility-wide fuel usage limit from 15,546.7 MMBtu/day to 19,600 MMBtu/day

N-1276-9-6:

The applicant is proposing to receive an Authority to Construct permit to increase the facility-wide fuel usage limit from 15,546.7 MMBtu/day to 19,600 MMBtu/day and to limit the annual fuel input to 864,000 MMBtu.

N-1276-15-3:

The applicant is proposing to receive an Authority to Construct permit to decrease the NOx limit from 7 ppmvd to 5 ppmvd (both @ 3% O₂), to increase the annual fuel usage limit of this unit from 140,430.147 MMBtu to 200,000 MMBtu and to increase the facility-wide fuel usage limit from 15,546.7 MMBtu/day to 19,600 MMBtu/day.

N-1276-18-0:

The applicant is proposing the installation of a 180 MMBtu/hr natural gas fired boiler with a Selective Catalytic Reduction (SCR) system. A 0.5 hr/day and 20 hr/year start-up period emission allowance as well as a 475,000 MMBtu/year fuel usage limit has been proposed. This unit will be included in the proposed 19,600 MMBtu/day fuel usage limit.

The premodification emission quantities will be calculated assuming that Authorities to Construct (ATC's) N-1276-1-11, N-1276-2-12, N-1267-3-11, N-1276-8-5, N-1276-9-5 and N-1276-15-2 were previously implemented. These ATC's will therefore require prior implementation of the above listed ATC's.

II. Applicable Rules

- 2201 New and Modified Stationary Source Review Rule (9/21/06)
- 2520 Federally Mandated Operating Permits (6/21/01)
- 2550 Federally Mandated Preconstruction Review for Major Sources of Air Toxics (6/18/98)
- 4001 New Source Performance Standards (4/14/99)
- 4002 National Emission Standards for Hazardous Air Pollutants (5/20/04)
- 4101 Visible Emissions (11/15/01)
- 4102 Nuisance (12/17/92)
- 4201 Particulate Matter Concentration (12/17/92)
- 4301 Fuel Burning Equipment (12/17/92)
- 4304 Equipment Tuning Procedure for Boilers, Steam Generators and process Heaters (10/19/09)
- 4305 Boilers, Steam Generators and Process Heaters – Phase 2 (12/19/96)
- 4306 Boilers, Steam Generators and Process Heaters – Phase 3 (10/16/08)
- 4320 Advanced Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
- 4351 Boilers, Steam Generators and Process Heaters (8/21/03)

4801 Sulfur Compounds (12/17/92)
CH&SC 41700
CH&SC 42301.6

III. Project Location

9950 S. Ingomar Grade
Los Banos, CA

The equipment is not located within 1,000 feet of a K-12 school.

IV. Process Description

As allowed by their respective permits, the boilers will combust natural gas for the purpose of heating water for use in processes at the plant.

V. Equipment Listing

N-1276-1:

93 MMBTU/HR NEBRASKA MODEL NS-D-65 BOILER WITH A CSI LOW NOX BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTAK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION.

N-1276-2:

93 MMBTU/HR NEBRASKA MODEL NS-D-65 BOILER WITH A CSI LOW NOX BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTAK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION.

N-1276-3:

156 MMBTU/HR NEBRASKA MODEL N25-T-84 BOILER WITH A TODD RMB ULTRA-LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM.

N-1276-8:

182.5 MMBTU/HR ENGLISH MODEL 150-H-600 WATERTUBE BOILER EQUIPPED WITH A TODD/RADIAN RMB BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM.

N-1276-9:

182.5 MMBTU/HR ENGLISH MODEL 150-H-600 WATERTUBE BOILER EQUIPPED WITH A TODD/RADIAN RMB BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM.

N-1276-15:

98 MMBTU/HR NATURAL GAS-FIRED NEBRASKA MODEL NS-F/S 68 BOILER EQUIPPED WITH A TODD VARI-FLAME MODEL #V8151G0XXX LOW NOX BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTACK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION.

N-1276-18:

180 MMBTU/HR NATURAL GAS FIRED NEBRASKA MODEL 500D-100 BOILER EQUIPPED WITH A JOHN ZINK VARIFLAME BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A HALDOR TOPSOE SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION.

VI. Emission Control Technology Evaluation

N-1276-1, N-1276-2, N-1276-3, N-1276-8, N-1276-9 and N-1276-15:

There will be no changes or additions to the emission control systems, therefore, a control technology evaluation is not necessary.

N-1276-18:

The unit will be equipped with a flue gas recirculation system and a selective catalytic reduction system. Both of these systems are for NOx control.

Flue Gas Recirculation System:

A flue gas recirculation system recycles a portion of the exhaust gas back into the burner. Since the exhaust gas contains little oxygen, it has the affect of reducing the flame temperature, which in turn, reduces the formation of thermal NOx.

Selective Catalytic Reduction System:

SCR systems work by injecting ammonia vapor into the exhaust gas, which is then passed through a catalyst. In the catalyst, the ammonia reacts with the NOx and oxygen to form nitrogen and water. The proposed system is expected to provide at least 85% NOx control.

VII. General Calculations

A. Assumptions

Assumptions will be stated as they are made.

B. Emission Factors

Premodification:

	Emission Factors				
	ppmvd @ 15% O ₂ (lb/MMBtu)		Lb/MMBtu		
	NOx	CO	VOC	SOx	PM10
N-1276-1	7 (0.008)	100 (0.074)	0.00292	0.00285	0.00523
N-1276-2	7 (0.008)	100 (0.074)	0.0055	0.00285	0.0076
N-1276-3	7 (0.008)	100 (0.074)	0.0055	0.00285	0.0076
N-1276-8	7 (0.008)	100 (0.074)	0.0004	0.00285	0.0033
N-1276-9	7 (0.008)	100 (0.074)	0.0004	0.00285	0.0033
N-1276-15	7 (0.008)	50 (0.037)	0.0055	0.00285	0.0076

Postmodification:

Except for NOx for units 1, 2 and 15, no changes to the permitted emission factor limits are proposed. The proposed limits are presented on the following table.

	Emission Factors				
	ppmvd @ 15% O ₂ (lb/MMBtu)		Lb/MMBtu		
	NOx	CO	VOC	SOx	PM10
N-1276-1	5 (0.0062)	100 (0.074)	0.00292	0.00285	0.00523
N-1276-2	5 (0.0062)	100 (0.074)	0.0055	0.00285	0.0076
N-1276-3	7 (0.008)	100 (0.074)	0.0055	0.00285	0.0076
N-1276-8	7 (0.008)	100 (0.074)	0.0004	0.00285	0.0033
N-1276-9	7 (0.008)	100 (0.074)	0.0004	0.00285	0.0033
N-1276-15	5 (0.0062)	50 (0.037)	0.0055	0.00285	0.0076
N-1276-18					
Non-Start-Up ¹	5 (0.0062)	100 (0.074)	0.004	0.00285	0.0076
Start-up	40 (0.048)	400 (0.30)	0.004	0.00285	0.0076

C. Potential to Emit (PE)

1. Daily PE

Premodification PE:

The following potentials to emit are from the Application Review document for project N-1091731.

¹ Non-start-up/shutdown operation has commonly been referred to as steady-state operation. However, this term does not clearly state the District's intent regarding emissions during ramp-up or ramp-down periods that occur during load-following. Since it is the District's intent to allow higher emissions only during start-up periods (not load-following or shut-down periods), the operating periods that are not start-up periods will be referred to as non-start-up operation instead of steady-state operation.

N-1276-1-11:

PE_{NOx} = 17.3 lb/day
PE_{CO} = 159.8 lb/day
PE_{VOC} = 6.3 lb/day
PE_{SOx} = 6.2 lb/day
PE_{PM10} = 11.3 lb/day
PE_{NH3} = 9.7 lb/day

N-1276-2-12:

PE_{NOx} = 17.3 lb/day
PE_{CO} = 159.8 lb/day
PE_{VOC} = 11.9 lb/day
PE_{SOx} = 6.2 lb/day
PE_{PM10} = 16.4 lb/day
PE_{NH3} = 9.7 lb/day

N-1276-3-11:

PE_{NOx} = 30.0 lb/day
PE_{CO} = 277.1 lb/day
PE_{VOC} = 20.6 lb/day
PE_{SOx} = 10.7 lb/day
PE_{PM10} = 28.5 lb/day
PE_{NH3} = 0 lb/day

N-1276-8-5:

PE_{NOx} = 35.0 lb/day
PE_{CO} = 324.1 lb/day
PE_{VOC} = 1.8 lb/day
PE_{SOx} = 12.5 lb/day
PE_{PM10} = 14.5 lb/day
PE_{NH3} = 0 lb/day

N-1276-9-5:

PE_{NOx} = 35.0 lb/day
PE_{CO} = 324.1 lb/day
PE_{VOC} = 1.8 lb/day
PE_{SOx} = 12.5 lb/day
PE_{PM10} = 14.5 lb/day
PE_{NH3} = 0 lb/day

N-1276-15-2:

PE_{NOx} = 18.8 lb/day
PE_{CO} = 87.0 lb/day
PE_{VOC} = 12.9 lb/day
PE_{SOx} = 6.7 lb/day
PE_{PM10} = 17.9 lb/day
PE_{NH3} = 10.5 lb/day

Post Modification PE:

The applicant has proposed modifications to the NOx emission limits for units N-1276-1, N-1276-2 and N-1276-15. Therefore, the NOx emissions from those units must be recalculated. None of the other daily emission quantities will change, therefore they will be as calculated in the Application Review document for project N-1091731.

N-1276-1-12:

Fuel Usage: 2,160 MMBtu/day (permit limit)

$$\begin{aligned} PE_{NOx} &= (0.0062 \text{ lb/MMBtu})(2,160 \text{ MMBtu/day}) = 13.4 \text{ lb/day} \\ PE_{CO} &= 159.8 \text{ lb/day} \\ PE_{VOC} &= 6.3 \text{ lb/day} \\ PE_{SOx} &= 6.2 \text{ lb/day} \\ PE_{PM10} &= 11.3 \text{ lb/day} \\ PE_{NH3} &= 9.7 \text{ lb/day} \end{aligned}$$

N-1276-2-13:

Fuel Usage: 2,160 MMBtu/day (permit limit)

$$\begin{aligned} PE_{NOx} &= (0.0062 \text{ lb/MMBtu})(2,160 \text{ MMBtu/day}) = 13.4 \text{ lb/day} \\ PE_{CO} &= 159.8 \text{ lb/day} \\ PE_{VOC} &= 11.9 \text{ lb/day} \\ PE_{SOx} &= 6.2 \text{ lb/day} \\ PE_{PM10} &= 16.4 \text{ lb/day} \\ PE_{NH3} &= 9.7 \text{ lb/day} \end{aligned}$$

N-1276-3-12:

$$\begin{aligned} PE_{NOx} &= 30.0 \text{ lb/day} \\ PE_{CO} &= 277.1 \text{ lb/day} \\ PE_{VOC} &= 20.6 \text{ lb/day} \\ PE_{SOx} &= 10.7 \text{ lb/day} \\ PE_{PM10} &= 28.5 \text{ lb/day} \\ PE_{NH3} &= 0 \text{ lb/day} \end{aligned}$$

N-1276-8-6:

$$\begin{aligned} PE_{NOx} &= 35.0 \text{ lb/day} \\ PE_{CO} &= 324.1 \text{ lb/day} \\ PE_{VOC} &= 1.8 \text{ lb/day} \\ PE_{SOx} &= 12.5 \text{ lb/day} \\ PE_{PM10} &= 14.5 \text{ lb/day} \\ PE_{NH3} &= 0 \text{ lb/day} \end{aligned}$$

N-1276-9-6:

$PE_{NO_x} = 35.0 \text{ lb/day}$
 $PE_{CO} = 324.1 \text{ lb/day}$
 $PE_{VOC} = 1.8 \text{ lb/day}$
 $PE_{SO_x} = 12.5 \text{ lb/day}$
 $PE_{PM_{10}} = 14.5 \text{ lb/day}$
 $PE_{NH_3} = 0 \text{ lb/day}$

N-1276-15-3:

Fuel Usage: $(98 \text{ MMBtu/hr})(24 \text{ hr/day}) = 2,352 \text{ MMBtu/day}$

$PE_{NO_x} = (0.0062 \text{ lb/MMBtu})(2,352 \text{ MMBtu/day}) = 14.6 \text{ lb/day}$
 $PE_{CO} = 87.0 \text{ lb/day}$
 $PE_{VOC} = 12.9 \text{ lb/day}$
 $PE_{SO_x} = 6.7 \text{ lb/day}$
 $PE_{PM_{10}} = 17.9 \text{ lb/day}$
 $PE_{NH_3} = 10.5 \text{ lb/day}$

N-1276-18-0:

$NO_x = (180 \text{ MMBtu/hr})[(0.0062 \text{ lb/MMBtu})(23.5 \text{ hr/day}) + (0.048 \text{ lb/MMBtu})(0.5 \text{ hr/day})] = 30.5 \text{ lb/day}$
 $CO = (180 \text{ MMBtu/hr})[(0.074 \text{ lb/MMBtu})(23.5 \text{ hr/day}) + (0.3 \text{ lb/MMBtu})(0.5 \text{ hr/day})] = 340.0 \text{ lb/day}$
 $VOC = (180 \text{ MMBtu/hr})(0.004 \text{ lb/MMBtu})(24 \text{ hr/day}) = 17.3 \text{ lb/day}$
 $SO_x = (180 \text{ MMBtu/hr})(0.00285 \text{ lb/MMBtu})(24 \text{ hr/day}) = 12.3 \text{ lb/day}$
 $PM_{10} = (180 \text{ MMBtu/hr})(0.0076 \text{ lb/MMBtu})(24 \text{ hr/day}) = 32.8 \text{ lb/day}$

The unit will also have ammonia emissions from the selective catalytic reduction system. The applicant reported the potential ammonia emissions in terms of ppm, therefore, the following equation will be utilized to determine the potential to emit.

$$PE = (\text{ppm})(MW)(2.63 \times 10^{-9})(ff)(C)(20.9/(20.9 - \%O_2)) \text{ lb/hr}$$

Where: ppm is the emission concentration

$NH_3 = 10 \text{ ppmvd}$ (applicant)

MW is the molecular wt. of the pollutant

$MW_{NH_3} = 17 \text{ lb/lb-mol}$

2.63×10^{-9} is a constant (at 60 degrees F)

ff is the f-factor of natural gas (8,578 dscf/MMBtu at 60 degrees F)

C is the capacity of the equipment (180 MMBtu/hr)

% O_2 is the oxygen content to which the stack exhaust is corrected (3%)

Operating Schedule: 24 hr/day

$$PE_{NH_3} = [(10)(17)(2.63 \times 10^{-9})(8,578)(180)(20.9/(20.9-3))\text{lb/hr}] \times (24 \text{ hr/day}) = 19.3 \text{ lb/day}$$

2. Annual PE

Unless otherwise stated, the annual emissions are from the Application Review document for project N-1091731.

Premodification PE:

N-1276-1-11:

$PE_{NOx} = 6,315 \text{ lb/yr}$
 $PE_{CO} = 58,327 \text{ lb/yr}$
 $PE_{VOC} = 2,300 \text{ lb/yr}$
 $PE_{SOx} = 2,263 \text{ lb/yr}$
 $PE_{PM10} = 4,125 \text{ lb/yr}$
 $PE_{NH3} = 3,541 \text{ lb/yr}$

N-1276-2-12:

$PE_{NOx} = 6,315 \text{ lb/yr}$
 $PE_{CO} = 58,327 \text{ lb/yr}$
 $PE_{VOC} = 4,344 \text{ lb/yr}$
 $PE_{SOx} = 2,263 \text{ lb/yr}$
 $PE_{PM10} = 5,986 \text{ lb/yr}$
 $PE_{NH3} = 3,541 \text{ lb/yr}$

N-1276-3-11:

$PE_{NOx} = 10,950 \text{ lb/yr}$
 $PE_{CO} = 101,142 \text{ lb/yr}$
 $PE_{VOC} = 7,519 \text{ lb/yr}$
 $PE_{SOx} = 3,906 \text{ lb/yr}$
 $PE_{PM10} = 10,403 \text{ lb/yr}$
 $PE_{NH3} = 0 \text{ lb/yr}$

N-1276-8-5:

$PE_{NOx} = 12,775 \text{ lb/yr}$
 $PE_{CO} = 118,297 \text{ lb/yr}$
 $PE_{VOC} = 657 \text{ lb/yr}$
 $PE_{SOx} = 4,563 \text{ lb/yr}$
 $PE_{PM10} = 5,293 \text{ lb/yr}$
 $PE_{NH3} = 0 \text{ lb/yr}$

N-1276-9-5:

$PE_{NOx} = 12,775 \text{ lb/yr}$
 $PE_{CO} = 118,297 \text{ lb/yr}$
 $PE_{VOC} = 657 \text{ lb/yr}$
 $PE_{SOx} = 4,563 \text{ lb/yr}$
 $PE_{PM10} = 5,293 \text{ lb/yr}$
 $PE_{NH3} = 0 \text{ lb/yr}$

N-1276-15-2:

$PE_{NO_x} = 1,123 \text{ lb/yr}$
 $PE_{CO} = 5,196 \text{ lb/yr}$
 $PE_{VOC} = 772 \text{ lb/yr}$
 $PE_{SO_x} = 400 \text{ lb/yr}$
 $PE_{PM_{10}} = 1,067 \text{ lb/yr}$
 $PE_{NH_3} = 629 \text{ lb/yr}$

Post Modification PE:

The applicant has proposed modifications to the NO_x emission limits for units N-1276-1, N-1276-2 and N-1276-15. Therefore, the NO_x emissions from those units must be recalculated. In addition to the NO_x limit changes, the applicant has proposed annual fuel usage limits of the following:

N-1276-3: 1,063,560 MMBtu/yr
 N-1276-9: 864,000 MMBtu/yr
 N-1276-15: 200,000 MMBtu/yr
 N-1276-18: 475,000 MMBtu/yr

N-1276-1-12:

$PE_{NO_x} = (13.4 \text{ lb/day})(365 \text{ days/yr}) = 4,891 \text{ lb/yr}$
 $PE_{CO} = 58,327 \text{ lb/yr}$
 $PE_{VOC} = 2,300 \text{ lb/yr}$
 $PE_{SO_x} = 2,263 \text{ lb/yr}$
 $PE_{PM_{10}} = 4,125 \text{ lb/yr}$
 $PE_{NH_3} = 3,541 \text{ lb/yr}$

N-1276-2-13:

$PE_{NO_x} = (13.4 \text{ lb/day})(365 \text{ days/yr}) = 4,891 \text{ lb/yr}$
 $PE_{CO} = 58,327 \text{ lb/yr}$
 $PE_{VOC} = 4,344 \text{ lb/yr}$
 $PE_{SO_x} = 2,263 \text{ lb/yr}$
 $PE_{PM_{10}} = 5,986 \text{ lb/yr}$
 $PE_{NH_3} = 3,541 \text{ lb/yr}$

N-1276-3-12:

$PE_{NO_x} = (1,063,560 \text{ MMBtu/yr})(0.008 \text{ lb/MMBtu}) = 8,508 \text{ lb/yr}$
 $PE_{CO} = (1,063,560 \text{ MMBtu/yr})(0.074 \text{ lb/MMBtu}) = 78,703 \text{ lb/yr}$
 $PE_{VOC} = (1,063,560 \text{ MMBtu/yr})(0.0055 \text{ lb/MMBtu}) = 5,850 \text{ lb/yr}$
 $PE_{SO_x} = (1,063,560 \text{ MMBtu/yr})(0.00285 \text{ lb/MMBtu}) = 3,031 \text{ lb/yr}$
 $PE_{PM_{10}} = (1,063,560 \text{ MMBtu/yr})(0.0076 \text{ lb/MMBtu}) = 8,083 \text{ lb/yr}$
 $PE_{NH_3} = 0 \text{ lb/yr}$

N-1276-8-6:

$$\begin{aligned}PE_{NO_x} &= 12,775 \text{ lb/yr} \\PE_{CO} &= 118,297 \text{ lb/yr} \\PE_{VOC} &= 657 \text{ lb/yr} \\PE_{SO_x} &= 4,563 \text{ lb/yr} \\PE_{PM_{10}} &= 5,293 \text{ lb/yr} \\PE_{NH_3} &= 0 \text{ lb/yr}\end{aligned}$$

N-1276-9-6:

$$\begin{aligned}PE_{NO_x} &= (864,000 \text{ MMBtu/yr})(0.008 \text{ lb/MMBtu}) = 6,912 \text{ lb/yr} \\PE_{CO} &= (864,000 \text{ MMBtu/yr})(0.074 \text{ lb/MMBtu}) = 63,936 \text{ lb/yr} \\PE_{VOC} &= (864,000 \text{ MMBtu/yr})(0.0004 \text{ lb/MMBtu}) = 346 \text{ lb/yr} \\PE_{SO_x} &= (864,000 \text{ MMBtu/yr})(0.00285 \text{ lb/MMBtu}) = 2,462 \text{ lb/yr} \\PE_{PM_{10}} &= (864,000 \text{ MMBtu/yr})(0.0033 \text{ lb/MMBtu}) = 2,851 \text{ lb/yr} \\PE_{NH_3} &= 0 \text{ lb/yr}\end{aligned}$$

N-1276-15-3:

$$\begin{aligned}PE_{NO_x} &= (200,000 \text{ MMBtu/yr})(0.0062 \text{ lb/MMBtu}) = 1,240 \text{ lb/yr} \\PE_{CO} &= (200,000 \text{ MMBtu/yr})(0.037 \text{ lb/MMBtu}) = 7,400 \text{ lb/yr} \\PE_{VOC} &= (200,000 \text{ MMBtu/yr})(0.0055 \text{ lb/MMBtu}) = 1,100 \text{ lb/yr} \\PE_{SO_x} &= (200,000 \text{ MMBtu/yr})(0.00285 \text{ lb/MMBtu}) = 570 \text{ lb/yr} \\PE_{PM_{10}} &= (200,000 \text{ MMBtu/yr})(0.0076 \text{ lb/MMBtu}) = 1,520 \text{ lb/yr} \\PE_{NH_3} &= [(10)(17)(2.63 \times 10^{-9})(8,578)(200,000)(20.9/(20.9-3))\text{lb/yr}] = 896 \text{ lb/yr}\end{aligned}$$

N-1276-18-0:

The annual fuel usage of this unit will be limited to 475,000 MMBtu and the annual start-up time will be limited to 20 hours. Therefore, the start-up period fuel burning capacity will be:

$$(180 \text{ MMBtu/hr})(20 \text{ hr/yr}) = 3,600 \text{ MMBtu/yr}$$

If 3,600 MMBtu/yr of fuel were burned during start-ups, the following quantity could be burned at other times:

$$475,000 \text{ MMBtu/yr} - 3,600 \text{ MMBtu/yr} = 471,400 \text{ MMBtu/yr}$$

$$\begin{aligned}PE_{NO_x} &= (0.0062 \text{ lb/MMBtu})(471,400 \text{ MMBtu/yr}) \\&\quad + (0.048 \text{ lb/MMBtu})(3,600 \text{ MMBtu/yr}) = 3,095 \text{ lb/yr}\end{aligned}$$

$$\begin{aligned}PE_{CO} &= (0.074 \text{ lb/MMBtu})(471,400 \text{ hr/yr}) \\&\quad + (0.3 \text{ lb/MMBtu})(3,600 \text{ MMBtu/yr}) = 35,964 \text{ lb/yr}\end{aligned}$$

$$PE_{VOC} = (0.004 \text{ lb/MMBtu})(475,000 \text{ Btu/yr}) = 1,900 \text{ lb/yr}$$

$$PE_{SO_x} = (0.00285 \text{ lb/MMBtu})(475,000 \text{ Btu/yr}) = 1,354 \text{ lb/yr}$$

$$PE_{PM10} = (0.0076 \text{ lb/MMBtu})(475,000 \text{ Btu/yr}) = 3,610 \text{ lb/yr}$$

$$PE_{NH3} = [(10)(17)(2.63 \times 10^{-9})(8,578)(475,000)(20.9/(20.9-3))\text{lb/yr}] = 2,127 \text{ lb/yr}$$

D. Increase in Permitted Emissions (IPE)

1. Quarterly IPE

N-1276-1-12:

As shown in section VII.C.2 of this document, there will be a change only in NOx emissions. Therefore, the IPE of CO, VOC, SOx and PM10 will be zero.

$$IPE_{NOx} = (4,891 \text{ lb/yr} - 6,315 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -356 \text{ lb/qtr}$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	4,891	2,263	4,125	58,327	2,300
Daily PE	13.4	6.2	11.3	159.8	6.3
Δ PE (Qtr 1)	-356	0	0	0	0
Δ PE (Qtr 2)	-356	0	0	0	0
Δ PE (Qtr 3)	-356	0	0	0	0
Δ PE (Qtr 4)	-356	0	0	0	0

N-1276-2-13:

As shown in section VII.C.2 of this document, there will be a change only in NOx emissions. Therefore, the IPE of CO, VOC, SOx and PM10 will be zero.

$$IPE_{NOx} = (4,891 \text{ lb/yr} - 6,315 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -356 \text{ lb/qtr}$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	4,891	2,263	5,986	58,327	4,344
Daily PE	13.4	6.2	16.4	159.8	11.9
Δ PE (Qtr 1)	-356	0	0	0	0
Δ PE (Qtr 2)	-356	0	0	0	0
Δ PE (Qtr 3)	-356	0	0	0	0
Δ PE (Qtr 4)	-356	0	0	0	0

N-1276-3-12:

$$\begin{aligned} \text{IPE}_{\text{NOx}} &= (8,508 \text{ lb/yr} - 10,950 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -610.5 \text{ lb/qtr} \\ \text{IPE}_{\text{CO}} &= (78,703 \text{ lb/yr} - 101,142 \text{ lb/yr}) / 4 \text{ qtr/yr} = -5,609.75 \text{ lb/qtr} \\ \text{IPE}_{\text{VOC}} &= (5,850 \text{ lb/yr} - 7,519 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -417.25 \text{ lb/qtr} \\ \text{IPE}_{\text{SOx}} &= (3,031 \text{ lb/yr} - 3,906 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -218.75 \text{ lb/qtr} \\ \text{IPE}_{\text{PM10}} &= (8,083 \text{ lb/yr} - 10,403 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -580 \text{ lb/qtr} \end{aligned}$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO(lb)	VOC (lb)
Annual PE	8,508	3,031	8,083	78,703	5,850
Daily PE	30.0	10.7	28.5	277.1	20.6
Δ PE (Qtr 1)	-610	-218	-580	-5,609	-417
Δ PE (Qtr 2)	-610	-219	-580	-5,610	-417
Δ PE (Qtr 3)	-611	-219	-580	-5,610	-417
Δ PE (Qtr 4)	-611	-219	-580	-5,610	-418

N-1276-8-6:

As shown in section VII.C.2 of this document, there will not be a change in the annual potential to emit of any pollutant. Therefore, there will be no quarterly IPE's.

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	12,775	4,563	5,293	118,297	657
Daily PE	35.0	12.5	14.5	324.1	1.8
Δ PE (Qtr 1)	0	0	0	0	0
Δ PE (Qtr 2)	0	0	0	0	0
Δ PE (Qtr 3)	0	0	0	0	0
Δ PE (Qtr 4)	0	0	0	0	0

N-1276-9-6:

$$IPE_{NOx} = (6,912 \text{ lb/yr} - 12,775 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -1,465.75 \text{ lb/qtr}$$

$$IPE_{CO} = (63,936 \text{ lb/yr} - 118,297 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -13,590.25 \text{ lb/qtr}$$

$$IPE_{VOC} = (346 \text{ lb/yr} - 657 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -77.75 \text{ lb/qtr}$$

$$IPE_{SOx} = (2,462 \text{ lb/yr} - 4,563 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -525.25 \text{ lb/qtr}$$

$$IPE_{PM10} = (2,851 \text{ lb/yr} - 5,293 \text{ lb/yr}) / (4 \text{ qtr/yr}) = -610.5 \text{ lb/qtr}$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	6,912	2,462	2,851	63,936	346
Daily PE	35.0	12.5	14.5	324.1	1.8
Δ PE (Qtr 1)	-1,465	-525	-610	-13,590	-77
Δ PE (Qtr 2)	-1,466	-525	-610	-13,590	-78
Δ PE (Qtr 3)	-1,466	-525	-611	-13,590	-78
Δ PE (Qtr 4)	-1,466	-526	-611	-13,591	-78

N-1276-15-3:

$$IPE_{NOx} = (1,240 \text{ lb/yr} - 1,123 \text{ lb/yr}) / (4 \text{ qtr/yr}) = 29.25 \text{ lb/qtr}$$

$$IPE_{CO} = (7,400 \text{ lb/yr} - 5,196 \text{ lb/yr}) / (4 \text{ qtr/yr}) = 551.0 \text{ lb/qtr}$$

$$IPE_{VOC} = (1,100 \text{ lb/yr} - 772 \text{ lb/yr}) / (4 \text{ qtr/yr}) = 82.0 \text{ lb/qtr}$$

$$IPE_{SOx} = (570 \text{ lb/yr} - 400 \text{ lb/yr}) / (4 \text{ qtr/yr}) = 42.5 \text{ lb/qtr}$$

$$IPE_{PM10} = (1,520 \text{ lb/yr} - 1,067 \text{ lb/yr}) / (4 \text{ qtr/yr}) = 113.25 \text{ lb/qtr}$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	1,240	570	1,520	7,400	1,100
Daily PE	14.6	6.7	17.9	87.0	12.9
Δ PE (Qtr 1)	29	42	113	551	82
Δ PE (Qtr 2)	29	42	113	551	82
Δ PE (Qtr 3)	29	43	113	551	82
Δ PE (Qtr 4)	30	43	114	551	82

N-1276-18-0:

$$IPE_{NOx} = 3,095 \text{ lb/yr} = 773.75 \text{ lb/qtr}$$

$$IPE_{CO} = 35,964 \text{ lb/yr} = 8,991 \text{ lb/qtr}$$

$$IPE_{VOC} = 1,900 \text{ lb/yr} = 475 \text{ lb/qtr}$$

$$IPE_{SOx} = 1,354 \text{ lb/yr} = 338.5$$

$$IPE_{PM10} = 3,610 \text{ lb/yr} = 902.5 \text{ lb/qtr}$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	3,095	1,354	3,610	35,964	1,900
Daily PE	30.5	12.3	32.8	340.0	17.3
Δ PE (Qtr 1)	773	338	902	8,991	475
Δ PE (Qtr 2)	774	338	902	8,991	475
Δ PE (Qtr 3)	774	339	903	8,991	475
Δ PE (Qtr 4)	774	339	903	8,991	475

2. Adjusted Increase in Permitted Emissions (AIPE)

AIPE is utilized to determine whether or not Best Available Control Technology (BACT) is required for modified units. BACT is a Rule 2201 requirement, and as explained in section VIII (Rule 2201 Compliance) of this document, only unit N-1276-8 is subject to Rule 2201. Therefore, AIPE calculations are required only for unit N-1276-8. AIPE is calculated as follows:

$$AIPE = PE2 - HAPE$$

Where: PE2 is the post project PE, in lb/day
HAPE is the Historically Adjusted Potential to Emit, in lb/day.
Where: HAPE = PE1(EF2/EF1)

Where: PE1 is the pre-project PE, in lb/day
EF1 is the pre-project emission factor
EF2 is the post-project emission factor

Note: If EF2 is greater than EF1, then EF2/EF1 is set to 1

N-1276-1-12:

	PE2 (lb/day)	PE1 (lb/day)	EF2 (lb/MMBtu)	EF1 (lb/MMBtu)	AIPE (lb/day)
NOx	13.4	17.3	0.0062	0.008	0.0
CO	159.8	159.8	0.074	0.074	0.0
VOC	6.3	6.3	0.00292	0.00292	0.0
SOx	6.2	6.2	0.00285	0.00285	0.0
PM10	11.3	11.3	0.00523	0.00523	0.0

N-1276-2-13:

	PE2 (lb/day)	PE1 (lb/day)	EF2 (lb/MMBtu)	EF1 (lb/MMBtu)	AIPE (lb/day)
NOx	13.4	17.3	0.0062	0.008	0.0
CO	159.8	159.8	0.074	0.074	0.0
VOC	11.9	11.9	0.0055	0.0055	0.0
SOx	6.2	6.2	0.00285	0.00285	0.0
PM10	16.4	16.4	0.0076	0.0076	0.0

N-1276-3-12:

	PE2 (lb/day)	PE1 (lb/day)	EF2 (lb/MMBtu)	EF1 (lb/MMBtu)	AIPE (lb/day)
NOx	30.0	30.0	0.008	0.008	0.0
CO	277.1	277.1	0.074	0.074	0.0
VOC	20.6	20.6	0.0055	0.0055	0.0
SOx	10.7	10.7	0.00285	0.00285	0.0
PM10	28.5	28.5	0.0076	0.0076	0.0

N-1276-8-6:

	PE2 (lb/day)	PE1 (lb/day)	EF2 (lb/MMBtu)	EF1 (lb/MMBtu)	AIPE (lb/day)
NOx	35.0	35.0	0.008	0.008	0.0
CO	324.1	324.1	0.074	0.074	0.0
VOC	1.8	1.8	0.0004	0.0004	0.0
SOx	12.5	12.5	0.00285	0.00285	0.0
PM10	14.5	14.5	0.0033	0.0033	0.0

N-1276-9-6:

	PE2 (lb/day)	PE1 (lb/day)	EF2 (lb/MMBtu)	EF1 (lb/MMBtu)	AIPE (lb/day)
NOx	35.0	35.0	0.008	0.008	0.0
CO	324.1	324.1	0.074	0.074	0.0
VOC	1.8	1.8	0.0004	0.0004	0.0
SOx	12.5	12.5	0.00285	0.00285	0.0
PM10	14.5	14.5	0.0033	0.0033	0.0

N-1276-15-3:

	PE2 (lb/day)	PE1 (lb/day)	EF2 (lb/MMBtu)	EF1 (lb/MMBtu)	AIPE (lb/day)
NOx	14.6	18.8	0.0062	0.008	0.0
CO	87.0	87.0	0.037	0.037	0.0
VOC	12.9	12.9	0.0055	0.0055	0.0
SOx	6.7	6.7	0.00285	0.00285	0.0
PM10	17.9	17.9	0.0076	0.0076	0.0

E. Facility Emissions

1. Pre Project Stationary Source Potential to Emit (SSPE1)

The SSPE1 balance is from the Application Review Document for project N-1091731.

	SSPE1				
	NOx	CO	VOC	SOx	PM10
PE (lb/yr)	45,396	167,538	15,676	16,172	27,748
ERC's(lb/yr)	0	0	0	0	0
Total	45,396	167,538	15,676	16,172	27,748

2. Post Project Stationary Source Potential to Emit (SSPE2)

The facility consists of the six boilers currently under consideration and one abrasive blasting operation. Per District policy GEAR 4, abrasive blasting operations are not subject to the New and Modified Stationary Review Rule (Rule 2201) and its emissions therefore do not contribute to the SSPE2 balance.

Permit #	Emission Factors (lb/MMBtu)				
	NOx	CO	VOC	SOx	PM ₁₀
N-1276-1-12	0.0062	0.074	0.00292	0.00285	0.00523
N-1276-2-13	0.0062	0.074	0.0055	0.00285	0.0076
N-1276-3-12	0.008	0.074	0.0055	0.00285	0.0076
N-1276-8-6	0.008	0.074	0.0004	0.00285	0.0033
N-1276-9-6	0.008	0.074	0.0004	0.00285	0.0033
N-1276-15-3	0.0062	0.037	0.0055	0.00285	0.0076
N-1276-18-0					
Non Start-up	0.0062	0.074	0.004	0.00285	0.0076
Start-up	0.048	0.3	0.004	0.00285	0.0076

Combined Fuel Use Limit: 19,600 MMBtu/day (applicant)

N-1276-1-12 Fuel Use Limit: 2,160 MMBtu/day (788,400 MMBtu/yr)
 N-1276-2-13 Fuel Use Limit: 2,160 MMBtu/day (788,400 MMBtu/yr)
 N-1276-3-12 Fuel Use Limit: 3,744 MMBtu/day (1,063,560 MMBtu/yr)
 N-1276-8-6 Fuel Use Limit: 4,380 MMBtu/day (1,598,700 MMBtu/yr)
 N-1276-9-6 Fuel Use Limit: 4,380 MMBtu/day (864,000 MMBtu/yr)
 N-1276-15-3 Fuel Use Limit: 2,532 MMBtu/day (200,000 MMBtu/yr)
 N-1276-18-0 Fuel Use Limit: 4,320 MMBtu/day (475,000 MMBtu/yr)

NO_x:

The applicant has proposed to limit the combined fuel usage of the boilers to 19,600 MMBtu/day. To calculate the worst case annual potential to emit, it will be assumed that the units burn their maximum fuel allotment in the order of descending NO_x emission factors. The maximum fuel allotment will be the unit's rated fuel burning capacity or its permitted fuel burning limit, which ever is lower.

N-1276-18-0 burns:	90 MMBtu/day & 3,600 MMBtu/yr @ 0.048 lb NO _x /MMBtu
N-1276-3-12 burns:	3,744 MMBtu/day & 1,063,560 MMBtu/yr @ 0.008 lb NO _x /MMBtu
N-1276-8-6 burns:	4,380 MMBtu/day & 1,598,700 MMBtu/yr @ 0.008 lb NO _x /MMBtu
N-1276-9-6 burns:	4,380 MMBtu/day & 864,000 MMBtu/yr @ 0.008 lb NO _x /MMBtu
N-1276-18-0 burns:	4,230 MMBtu/day & 471,400 MMBtu/yr @ 0.0062 lb NO _x /MMBtu
N-1276-15-3 burns:	2,532 MMBtu/day & 200,000 MMBtu/yr @ 0.0062 lb NO _x /MMBtu
N-1276-1-12 burns:	<u>244 MMBtu/day</u> & 89,060 MMBtu/yr @ 0.0062 lb NO _x /MMBtu
Daily Total	19,600 MMBtu/day

$$\begin{aligned} \text{SSPE2}_{\text{NO}_x} &= (3,600 \text{ MMBtu/yr})(0.048 \text{ lb/MMBtu}) \\ &+ (1,063,560 + 1,598,700 + 864,000) \text{ MMBtu/yr} (0.008 \text{ lb/MMBtu}) \\ &+ (471,400 + 200,000 + 89,060) \text{ MMBtu/yr} (0.0062 \text{ lb/MMBtu}) = 33,098 \text{ lb/yr} \end{aligned}$$

CO:

The applicant has proposed to limit the combined fuel usage of the boilers to 19,600 MMBtu/day. To calculate the worst case annual potential to emit, it will be assumed that the units burn their maximum fuel allotment in the order of descending CO emission factors. The maximum fuel allotment will be the unit's rated fuel burning capacity or its permitted fuel burning limit, which ever is lower.

N-1276-18-0 burns:	90 MMBtu/day & 3,600 MMBtu/yr @ 0.3 lb CO/MMBtu
N-1276-1-12 burns:	2,160 MMBtu/day & 788,400 MMBtu/yr @ 0.074 lb CO/MMBtu
N-1276-2-13 burns:	2,160 MMBtu/day & 788,400 MMBtu/yr @ 0.074 lb CO/MMBtu
N-1276-3-12 burns:	3,744 MMBtu/day & 1,063,560 MMBtu/yr @ 0.074 lb CO/MMBtu
N-1276-8-6 burns:	4,380 MMBtu/day & 1,598,700 MMBtu/yr @ 0.074 lb CO/MMBtu
N-1276-9-6 burns:	4,380 MMBtu/day & 864,000 MMBtu/yr @ 0.074 lb CO/MMBtu
N-1276-18-0 burns:	<u>2,686 MMBtu/day</u> & 471,400 MMBtu/yr @ 0.074 lb CO/MMBtu
Daily Total:	19,600 MMBtu/day

$$\begin{aligned} \text{SSPE2}_{\text{CO}} &= (3,600 \text{ MMBtu/yr})(0.3 \text{ lb/MMBtu}) + \\ &+ (788,400 + 788,400 + 1,063,560 + 1,598,700 + 864,000 \\ &+ 471,400) \text{ MMBtu/yr} (0.074 \text{ lb/MMBtu}) \\ &= 413,590 \text{ lb/yr} \end{aligned}$$

VOC:

The applicant has proposed to limit the combined fuel usage of the boilers to 19,600 MMBtu/day. To calculate the worst case annual potential to emit, it will be assumed that the units burn their maximum fuel allotment in the order of descending VOC emission factors. The maximum fuel allotment will be the unit's rated fuel burning capacity or its permitted fuel burning limit, whichever is lower.

Assume:

N-1276-2-13 burns:	2,160 MMBtu/day & 788,400 MMBtu/yr @ 0.0055 lb VOC/MMBtu
N-1276-3-12 burns:	3,744 MMBtu/day & 1,063,560 MMBtu/yr @ 0.0055 lb VOC/MMBtu
N-1276-15-3 burns:	2,532 MMBtu/day & 200 X 10 ³ MMBtu/yr @ 0.0055 lb VOC/MMBtu
N-1276-18-0 burns:	4,320 MMBtu/day & 475 X 10 ³ MMBtu/yr @ 0.004 lb VOC/MMBtu
N-1276-1-12 burns:	2,160 MMBtu/day & 788,400 MMBtu/yr @ 0.00292 lb VOC/MMBtu
N-1276-8-5 burns:	4,380 MMBtu/day & 1,598,700 MMBtu/yr @ 0.0004 lb VOC/MMBtu
N-1276-9-5 burns:	<u>304 MMBtu/day</u> & 110,960 MMBtu/yr @ 0.0004 lb VOC/MMBtu
Daily total	19,600 MMBtu/day

$$\begin{aligned} \text{SSPE2}_{\text{VOC}} &= (788,400 + 1,063,560 + 200,000) \text{ MMBtu/yr} (0.0055 \text{ lb/MMBtu}) \\ &\quad + (475,000 \text{ MMBtu/yr})(0.004 \text{ lb/MMBtu}) \\ &\quad + (788,400 \text{ MMBtu/yr})(0.00292 \text{ lb/MMBtu}) \\ &\quad + (1,598,700 + 110,960) \text{ MMBtu/yr} (0.0004 \text{ lb/MMBtu}) \\ &= 16,172 \text{ lb/yr} \end{aligned}$$

SO_x:

The applicant has proposed to limit the combined fuel usage of the boilers to 19,600 MMBtu/day. To calculate the worst case annual potential to emit, it will be assumed that the units will operate under the scenario that will maximize the annual permitted fuel use.

N-1276-1-12 burns:	2,160 MMBtu/day & 788,400 MMBtu/yr @ 0.00285 SO _x /MMBtu
N-1276-2-13 burns:	2,160 MMBtu/day & 788,400 MMBtu/yr @ 0.00285 lb SO _x /MMBtu
N-1276-3-12 burns:	3,744 MMBtu/day & 1,063,560 MMBtu/yr @ 0.00285 lb SO _x /MMBtu
N-1276-8-6 burns:	4,380 MMBtu/day & 1,598,700 MMBtu/yr @ 0.074 lb SO _x /MMBtu
N-1276-9-6 burns:	4,380 MMBtu/day & 864,000 MMBtu/yr @ 0.00285 lb SO _x /MMBtu
N-1276-18-0 burns:	<u>2,776 MMBtu/day</u> & 475,000 MMBtu/yr @ 0.0285 lb SO _x /MMBtu
Daily Total:	19,600 MMBtu/day

$$\begin{aligned} \text{SSPE2}_{\text{CO}} &= (788,400 + 788,400 + 1,063,560 + 1,598,700 + 864,000 \\ &\quad + 475,000 \text{ MMBtu/yr})(0.00285 \text{ lb/MMBtu}) = 15,897 \text{ lb/yr} \end{aligned}$$

PM₁₀:

The applicant has proposed to limit the combined fuel usage of the boilers to 19,600 MMBtu/day. To calculate the worst case annual potential to emit, it will be assumed that the units burn their maximum fuel allotment in the order of descending PM₁₀ emission factors. The maximum fuel allotment will be the unit's rated fuel burning capacity or its permitted daily fuel burning limit, whichever is lower.

Assume:

N-1276-2-13 burns:	2,160 MMBtu/day & 788,400 MMBtu/yr @ 0.0076 lb PM ₁₀ /MMBtu
N-1276-3-12 burns:	3,744 MMBtu/day & 1,063,560 MMBtu/yr @ 0.0076 lb PM ₁₀ /MMBtu
N-1276-15-3 burns:	2,352 MMBtu/day & 200 X 10 ³ MMBtu/yr @ 0.0076 lb PM ₁₀ /MMBtu
N-1276-18-0 burns:	4,320 MMBtu/day & 475,000 MMBtu/yr @ 0.0076 lb PM ₁₀ /MMBtu
N-1276-1-12 burns:	2,160 MMBtu/day & 788,400 MMBtu/yr @ 0.00523 lb PM ₁₀ /MMBtu
N-1276-8-6 burns:	4,380 MMBtu/day & 1,598,700 MMBtu/yr @ 0.0033 lb PM ₁₀ /MMBtu
N-1276-9-6 burns:	484 MMBtu/day & 176,660 MMBtu/yr @ 0.0033 lb PM ₁₀ /MMBtu
Daily Total	19,600 MMBtu/day

$$\begin{aligned} \text{SSPE2}_{\text{PM}_{10}} &= (788,400 + 1,063,560 + 200,000 + 475,000) \text{ MMBtu/yr} (0.0076 \text{ lb/MMBtu}) \\ &+ (788,400 \text{ MMBtu/yr}) (0.00523 \text{ lb/MMBtu}) \\ &+ (1,598,700 + 176,660) \text{ MMBtu/yr} (0.0033 \text{ lb/MMBtu}) \\ &= 29,187 \text{ lb/yr} \end{aligned}$$

	SSPE2				
	NOx	CO	VOC	SOx	PM10
PE (lb/yr)	33,098	413,590	16,172	15,897	29,187
ERC's (lb/yr)	0	0	0	0	0
Total	33,098	413,590	16,172	15,897	29,187

3. Stationary Source Increase in Permitted Emissions (SSIPE)

$$\text{SSIPE} = \text{SSPE2} - \text{SSPE1}$$

The SSPE1 and SSPE2 balances are from sections VII.E.1 and VII.E.2 of this document. SSIPE's calculated to be less than zero will be set to zero.

	SSPE2 (lb/yr)	SSPE1 (lb/yr)	SSIPE (lb/yr)
NOx	33,098	45,396	0
CO	413,590	167,538	246,052
VOC	16,172	15,676	496
SOx	15,897	16,172	0
PM10	29,187	27,748	1,439

4. Baseline Emissions

Section 3.7 of Rule 2201 defines Baseline Emissions as the pre-project potential to emit for non-Major Source pollutants, Highly Utilized Emission Units, Clean Emission Units and Fully Offset Emission Units as defined in Rule 2201. The

rule further states that if the unit is not one of the types specified above, the Baseline Emissions are equal to the Historical Actual Emissions.

NOx, VOC, SOx and PM10:

As shown in section VII.F of this document, the facility will be a non-Major Source for these pollutants. Therefore, the Baseline Emissions for these pollutants are equal to their respective pre-modification potentials to emit (Rule 2201, Section 3.7.1). Since the facility has generated no on-site emission reduction credits and the SSPE balance consists solely of the contributions of the units currently under consideration, the potential to emit of each of these pollutants is equal to its SSPE1 balance.

BE_{NOx}: 45,396 lb/yr
 BE_{VOC}: 15,676 lb/yr
 BE_{SOx}: 16,172 lb/yr
 BE_{PM10}: 27,748 lb/yr

CO:

As shown in section VII.F of this document, the facility will be a Major Source for CO. District BACT guideline 1.1.2, which applied to all of the units currently under consideration at the time the application was deemed complete, states that BACT for CO is natural gas fuel with LPG back-up. All of the units comply with this control level, therefore, the units are Clean Emission Units for CO. Per Section 3.7.1 of Rule 2201, the Baseline Emissions for Clean Emission Units are equal to their premodification potential to emit. Since the facility has generated no on-site emission reduction credits and the SSPE balance consists solely of the contributions of the units currently under consideration, the potential to emit of CO is equal to its SSPE1 balance.

BE_{CO}: 167,538 lb/yr

Baseline Emission Summary:

NOx (lb/yr)	CO (lb/yr)	VOC (lb/yr)	SOx (lb/yr)	PM10 (lb/yr)
45,396	167,538	15,676	16,172	27,748

F. Major Source Determination

Per Section 3.2.4 of District Rule 2201, the Major Source thresholds are as follows:

Pollutant	Threshold [lb/yr]
NOx	50,000
CO	200,000
VOC	50,000
SOx	140,000
PM10	140,000

Post-modification Potential to Emit:

Since no emission reduction credits have been generated at this facility, the post-modification potential to emit is equivalent to the SSPE2.

Pollutant	Potential to Emit [lb/yr]	Major Source
NOx	33,098	No
CO	413,590	Yes
VOC	16,172	No
SOx	15,897	No
PM10	29,187	No

G. Major Modification Determination

District Rule 2201 Major Modification:

The purpose of District Major Modification calculations is to determine the following:

If Best Available Control Technology (BACT) is triggered for a new or modified emission unit that results in a Major Modification (District Rule 2201, §4.1.3); and

If a public notification is triggered (District Rule 2201, §5.4.1).

As shown in section VII.F of this document, the facility is a Major Source for CO. However, section 3.23 of Rule 2201 does not include a Major Modification threshold for CO and the current permitting action is therefore not a Major Modification.

Federal Major Modification:

Pursuant to Section 3.17 of District Rule 2201, in order to qualify as a Federal Major Modification, a modification must first be a District Major Modification. The proposed project is not a District Major Modification, so it cannot be a Federal Major Modification.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

Applicability:

A. BACT

1. BACT Applicability

New or Relocated Units:

Except for CO, BACT is required for each pollutant with a PE of greater than 2.0 pounds per day. For CO, BACT is triggered if the PE of CO is greater than two pounds per day and the SSPE2 of CO is 200,000 pounds per year or greater.

Modified Units:

Except for CO, BACT is required for each pollutant with an AIPE of greater than 2.0 pounds per day. For CO, BACT is triggered if the AIPE of CO is greater than 2.0 pounds per day and the SSPE2 of CO is 200,000 pounds or greater.

Applicability:

N-1276-1, N-1276-2, N-1276-3, N-1276-8, N-1276-9 and N-1276-15:

These are modified units and as shown in section VII.D.2 of this document, the AIPE of each pollutant from each emission unit is less than 2.0 lb/day. Therefore, BACT is not required for these units.

N-1276-18:

This is a new emission unit and as shown in section VII.C.1 of this document, the PE of each pollutant will be greater than 2.0 lb/day and as shown in section VII.E.2, the SSPE2 of CO will be greater than 200,000 lb/yr. Therefore, BACT is required for the NOx, CO, VOC, SOx and PM10 emissions from this unit.

2. BACT Analysis

N-1276-1, N-1276-2, N-1276-3, N-1276-8, N-1276-9 and N-1276-15:

BACT is not required for these units, therefore, a BACT analysis is not necessary.

N-1276-18:

As shown in the Top-Down BACT analysis that is in Appendix D of this document, BACT is as follows:

NOx

A NOx level of 5 ppmvd @ 3% O₂ or 0.008 lb/MMBtu.

CO:

Natural gas fuel.

VOC:

Natural gas fuel.

SOx:

Natural gas fuel.

PM10:

Natural gas fuel.

The applicant is proposing a NOx level of 5 ppmvd @ 3% O₂ and is proposing the use of only natural gas fuel: Therefore, BACT requirements will be satisfied.

B. OFFSETS

1. Offset Applicability

Per Rule 2201, section 4.5.3, offsets are examined on a pollutant by pollutant basis and are triggered for any pollutant with a SSPE2 equal to or greater than the value on the following table:

Pollutant	SSPE2 (lb/yr)
NOx	20,000
CO (in CO attainment areas)	200,000
VOC	20,000
SOx	54,750
PM10	29,200

As shown in section VII.E.2 of this document, the SSPE2 of each pollutant is:

Pollutant	SSPE2 (lb/yr)	Offsets Triggered
NOx	33,098	Yes
CO	413,590	Yes
VOC	16,172	No
SOx	15,897	No
PM10	29,187	No

2. Quantity of Offsets Required

As shown above, offsets are triggered for NOx and CO and as shown in section VII.E.1 of this document the SSPE1 of NOx was above its offset threshold and the SSPE1 of CO was below its offset threshold.

Offset Quantity (NOx):

Per section 4.7.1 of District Rule 2201, for pollutants with SSPE1 balances of greater than their offset threshold, the offset quantity is the difference between the potential to emit (PE) of the new and modified units and the Baseline Emissions of the new and modified units. Since the SSPE2 balance consists solely of the units involved in this permitting action and there have been no on-site emission reductions banked, the NOx potential of the new and modified units is equivalent to the SSPE2 balance for NOx.

$$PE = 33,098 \text{ lb/yr}$$

$$BE = 45,396 \text{ lb/yr}$$

$$\text{Offset (NOx)} = 33,098 \text{ lb/yr} - 45,396 \text{ lb/yr} = 0 \text{ lb/yr}$$

Offset Quantity (CO):

Per section 4.7.2 of District Rule 2201, for pollutants with SSPE1 balances of less than their offset threshold, the offset quantity is the difference between the potential to emit (PE) of the new and modified units and offset threshold. CO falls into this category.

Per section 4.6.1 of District Rule 2201, increases in CO emissions in CO attainment areas are exempt from offsets if it is shown that the increases will not cause the violation of an air quality standard and the emission increases are consistent with Reasonable Further progress.

The facility is located in a CO attainment area, and as shown in the Ambient Air Quality Analysis summary in Appendix C of this document, the CO increases will not cause the violation of an air quality standard. Furthermore, the increase seems to be the result of Reasonable Further Progress. This CO increase is therefore exempt from offsets.

C. PUBLIC NOTIFICATION

1. Applicability

Section 5.4 of District Rule 2201 requires a public notification for the affected pollutants from the following types of projects:

- a. New Major Sources
- b. Major Modifications
- c. New emission units with a PE > 100 lb/day of any one pollutant (IPE Notifications)
- d. Modifications with SSPE1 below an offset threshold and SSPE 2 above an offset threshold on a pollutant by pollutant basis (Existing Facility Offset Threshold Exceedence Notification)
- e. New stationary sources with SSPE2 exceeding offset thresholds (New Facility Offset Threshold Exceedence Notification)
- f. Any permitting action with a SSIPE exceeding 20,000 lb/yr for any one pollutant. (SSIPE Notice)

a. New Major Source Notice Determination:

The facility is not new; therefore, a New Major Source Determination notice is not required.

b. Major Modification Notice:

As shown in section VII.G of this document, this permitting action is not a Major Modification. Therefore, a Major Modification notice is not required.

c. PE Notification:

A notification is required for each new emission unit with the potential to emit more than 100 pounds per day of any one affected pollutant. As shown in section VII.C.1 of this document, the potential to emit of CO will be in excess of 100 lb/day. Therefore, a notification is required.

d. Existing Facility Offset Threshold Exceedence Notification

The SSPE of CO will go from below to above an offset threshold. Therefore, a public notification is required.

e. New Facility Offset Threshold Exceedence Notification

This is an existing facility. This section does not require a public notification.

f. SSIPE Notification:

A notification is required for any permitting action that results in an SSIPE of more than 20,000 lb/yr of any affected pollutant. As shown in section VII.E.3 of this document, the SSIPE of CO will exceed 20,000 lb/yr. Therefore, an SSIPE notice is required.

2. Public Notice

As shown above, a public notification is required.

D. DAILY EMISSION LIMITS

N-1276-1-12

The NOx emissions shall not exceed 5 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu.
The CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu.
The VOC emissions shall not exceed 0.00292 lb/MMBtu.
The SOx emissions shall not exceed 0.00285 lb/MMBtu.
The PM10 emissions shall not exceed 0.00523 lb/MMBtu.
The ammonia emissions shall not exceed 10 ppmvd @ 3% O₂.

N-1276-2-13:

The NOx emissions shall not exceed 5 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu.
The CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu.
The VOC emissions shall not exceed 0.0055 lb/MMBtu.
The SOx emissions shall not exceed 0.00285 lb/MMBtu.
The PM10 emissions shall not exceed 0.0076 lb/MMBtu.
The ammonia emissions shall not exceed 10 ppmvd @ 3% O₂.

N-1276-3-12:

The NOx emissions shall not exceed 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu.
The CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu.
The VOC emissions shall not exceed 0.0055 lb/MMBtu.
The SOx emissions shall not exceed 0.00285 lb/MMBtu.
The PM10 emissions shall not exceed 0.0076 lb/MMBtu.

N-1276-8-6:

The NOx emissions shall not exceed 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu.
The CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu.
The VOC emissions shall not exceed 0.0004 lb/MMBtu.
The SOx emissions shall not exceed 0.00285 lb/MMBtu.
The PM10 emissions shall not exceed 0.0033 lb/MMBtu.

N-1276-9-6:

The NOx emissions shall not exceed 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu.
The CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu.
The VOC emissions shall not exceed 0.0004 lb/MMBtu.
The SOx emissions shall not exceed 0.00285 lb/MMBtu.
The PM10 emissions shall not exceed 0.0033 lb/MMBtu.

N-1276-15-3:

The NOx emissions shall not exceed 5 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu.
The CO emissions shall not exceed 50 ppmvd @ 3% O₂ or 0.037 lb/MMBtu.
The VOC emissions shall not exceed 0.0055 lb/MMBtu.
The SOx emissions shall not exceed 0.00285 lb/MMBtu.
The PM10 emissions shall not exceed 0.0076 lb/MMBtu.
The ammonia emissions shall not exceed 10 ppmvd @ 3% O₂.

N-1276-18-0:

The NOx emissions, during start-up periods shall not exceed 40 ppmvd @ 3% O₂ or 0.048 lb/MMBtu.
The CO emissions, during start-up periods shall not exceed 400 ppmvd @ 3% O₂ or 0.3 lb/MMBtu.
The start-up duration shall not exceed 0.5 hr/day.
The NOx emissions, at all times except start-ups, shall not exceed 5 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu.
The CO emissions, at all times except start-ups, shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu.
The VOC emissions shall not exceed 0.004 lb/MMBtu.
The SOx emissions shall not exceed 0.00285 lb/MMBtu.
The PM10 emissions shall not exceed 0.0076 lb/MMBtu.
The ammonia emissions shall not exceed 10 ppmvd @ 3% O₂.

E. Compliance Assurance

1. Source Testing

Source testing is required by District Rule 4320 (Advanced Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5.0 MMBtu/hr) and the ATC's and PTO's will reflect those requirements.

N-1276-1-12, N-1276-2-13, N-1276-3-12, N-1276-8-6, N-1276-9-6 & N-1276-15-3:

As stated in section I of this document, the ATC's proposed under this project will require the previous implementation of ATC's N-1276-1-11, N-1276-2-12, N-1276-3-11, N-1276-8-5, N-1276-9-5 & N-1276-15-2. This will ensure that compliance with the emission limits of Rule 4320 have been shown at least once. Therefore, these units may continue to operate under their current source testing schedule.

N-1276-18-0:

This is a new unit, therefore, it will require initial source testing to demonstrate compliance with the NO_x, CO and NH₃ limits of the ATC. The testing required by Rule 4320 will be required thereafter.

2. Monitoring

Refer to section VIII (Rule 4320 Compliance and 40 CFR Part 60 Subpart Db Compliance) for discussions of monitoring requirements.

3. Record Keeping

The permits currently include, and will continue to include a daily facility-wide fuel usage limit. The records necessary to verify compliance with those limits will continue to be required.

Permits N-1276-1 and N-1276-2 include daily fuel usage limits. The records necessary to verify compliance with those limits will continue to be required.

Permits N-1276-9, N-1276-15 and N-1276-18 will include annual heat input limits. The records necessary to verify compliance with those limits will be required.

The daily start-up duration of unit N-1276-18 will be limited by the ATC and the PTO. Records of the daily start-up period durations will therefore be required.

Each unit is subject to the periodic emission monitoring requirements of Rule 4320 and as required by that rule, records of the periodic monitoring activities will be required.

4. Reporting

40 CFR Part 60 Subpart Db requires excess emission reporting. Refer to section VIII (40 CFR Part 60 Subpart Db Compliance) of this document for a discussion of reporting requirements.

F. Ambient Air Quality Analysis

Section 4.14.2 of this rule requires that an air quality impact analysis (AQIA) be conducted to determine whether the operation of the proposed equipment will cause or make worse a violation of an air quality standard. The required analysis was conducted by the Technical Services Division of the SJVAPCD. Refer to appendix C of this document for the AQIA summary sheet.

As shown in the AAQIA included in appendix C of this document, the addition of the proposed equipment will not cause, or make worse a violation of an ambient air quality standard

Rule 2520 Federally Mandated Operating Permits

This rule applies to Major Sources of air pollutants and to Major Air Toxics Sources. The facility is operating under a Title V permit and this permitting action is a Minor Modification to that permit. The applicant has proposed to receive the Authorities to Construct with Certificates of Conformity so the following conditions will be placed on each Authority to Construct.

{1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Y

{1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Y

Major Air Toxics Source Determination:

To determine whether the facility is a Major Air Toxics Source, the facility-wide hazardous air pollutant (HAP) emissions will be compared to the Major Air Toxics Source thresholds. Those thresholds are 10 tons/yr of any single HAP or combined HAP emissions of 25 tons/yr. To determine the facility-wide potential to emit of HAPS, the facility-wide natural gas usage limit will be applied to the appropriate emission factor. Except for nickel and copper, the emissions factors are from the California Air Toxics Emission Factors (CATEF) database. The nickel and copper factors are from Tables 1.4-3 and 1.4-4 of EPA Document AP-42.

Facility-wide Fuel Usage: 19,600 MMBtu/day
Natural gas heat content: 1,000 Btu/scf

$$\text{Annual Fuel Usage} = (19,600 \text{ MMBtu/day})(365 \text{ days/yr})(\text{scf}/1000 \text{ Btu}) \\ = 7,154 \text{ MMscf/yr}$$

Compound	Emission Factor (lb/MMscf)	Potential to Emit (lb/yr)
Acetaldehyde	0.00887	63.5
Benzene	0.00431	30.8
Copper	0.00085	6.1
Formaldehyde	0.0221	158.1
Nickel	0.0021	15.0
Toluene	0.0034	24.3
Total	---	297.8

As can be seen, the potential to emit of no single HAP will exceed 10 tons per year and the combined HAP emissions will not exceed 25 tons/yr. The facility is therefore not a Major Air Toxics Source.

Rule 2550 Federally Mandated Preconstruction Review for Major Sources of Air Toxics

This rule applies to applications to construct or reconstruct a Major Air Toxics Sources. The facility will not be a newly constructed source, nor will it be a reconstructed source as defined in section 3.2 of this rule. This rule does not apply.

Rule 4001 New Source Performance Standards

40 CFR Part 60 Subpart Db:

This subpart applies to the units rated at over 100 MMBtu/hr. The facility currently includes the following subject units:

N-1276-3 (156 MMBtu/hr PUC-quality natural gas or LPG fired boiler)

N-1276-8 (182.5 MMBtu/hr PUC-quality natural gas fired boiler)

N-1276-9 (182.5 MMBtu/hr PUC-quality natural gas fired boiler)

Notes: LPG meets the section 60.41b definition of natural gas.

At the time these ATC's are implemented, PUC quality natural gas will be the only remaining permitted fuel.

Compliance for these units is addressed in the Application Review document for project N-1091731 and need not be readdressed.

This project includes a new 180 MMBtu/hr natural gas fired boiler (N-1276-18-0) that is also subject to this subpart. Compliance for this unit will be addressed at this time.

Emission Standards:

SOx Emission Standard:

Section 60.42b(k)(2) limits the SOx emissions to 0.32 lb/MMBtu of heat input. The unit will fire solely on natural gas and the SOx emission limit will be 0.00285 lb/MMBtu. Compliance with the SOx emission limit of this section is expected.

Particulate Matter Emission Standard:

Section 60.43b limits the particulate matter emissions from units that combust coal, oil, wood, municipal waste or wood. It does not limit particulate matter emissions during the combustion of natural gas. Since this unit will combust only natural gas, there is not an applicable particulate matter emission limit.

NOx Emission Standard:

Section 60.44b(l)(1) limits the NOx emissions to 0.20 lb/MMBtu of heat input. The NOx emissions from this unit will be limited to the District Rule 4320 level of 5 ppmvd @ 3% O₂, which is equivalent to 0.0062 lb/MMBtu. Compliance with the NOx emission limit of this section is expected.

Compliance Testing:

SOx Compliance Testing:

Per section 60.45b(j) units that combust very low sulfur oil, natural gas or a mixture of these fuels with any fuels not subject to an SO₂ standard are not subject to the testing requirements of this section provided the owner obtains fuel receipts as described in section 60.49b(r). Section 60.49b(r)(1) states that for natural gas fuel, the receipt must show that the fuel meets the section 60.41 definition of natural gas. The facility's fuel invoices will reflect that all fuels utilized meet the section 60.41 definition of natural gas.

Particulate Matter Testing:

As stated above, there is not an applicable particulate matter emission standard. Therefore, particulate matter testing is not required.

NOx Compliance Testing:

Section 60.46b(f)(1) requires source testing for compliance with the NOx emission limits of this subpart. The testing, which is equivalent to that specified in District Rule 4320, will be required.

Emission Monitoring:

SOx Emission Monitoring:

The unit will combust only natural gas as defined in section 60.41b and the facility maintains the fuel receipts described in section 60.49b(r). Therefore per sections 60.47b(f) and 60.45b(k), SOx emission monitoring is not required.

NOx Emission Monitoring:

Section 60.48b requires that the unit be operated with a CEMS for NOx except as provided under paragraphs (g), (h) and (i) of this section.

In lieu of a CEMS, the applicant is proposing the use of a predictive emission monitoring systems (PEMS), which are allowed by paragraph (g).

The PEMS will operate by continuously monitoring boiler operational parameters that have been demonstrated to impact NOx emissions (load, FGR rate and exhaust stack O₂). The ammonia injection rate of the selective catalytic reduction (SCR) system will also be monitored.

Initial modeling will be conducted over the unit's entire boiler operating range, which will be divided into five equal sub-ranges. Separate modeling will be conducted for each of the five sub-ranges. During the modeling, NOx and CO emission levels will be monitored while the FGR rate, the stack O₂ content and

ammonia injection rate are varied for the purpose of determining the FGR rate range, the stack O₂ content range and the ammonia injection rate range that indicate compliance with the NO_x and CO limits of this permit. Subsequent annual modeling will only be required at firing rates most representative of normal operation.

To ensure that initial modeling is conducted, the following conditions will be placed on the ATC:

Initial modeling, to determine the predictive emission monitoring system parameters ranges that indicate compliance with the NO_x emission limits of this permit shall be conducted within 60 days of initial start-up.

Acceptable ranges shall be determined for FGR rate, stack O₂ content and SCR system ammonia injection rate and they shall be determined for the entire operating range of the unit (broken up into five equal ranges). Separate modeling shall be conducted for each range.

Reporting and Record Keeping:

Section 60.49b(d) requires daily fuel usage records. Such fuel usage records are kept. It also requires that the annual capacity factor be determined and recorded. Since none of the applicable requirements of this subpart depend on capacity factors, records of capacity factors are not necessary.

As it applies to the equipment under consideration, section 60.49b(g) requires the facility to maintain records of the predicted hourly NO_x emission rates, the 30-day average NO_x emissions (in lb/MMBtu), the 30-day periods during which excess NO_x emissions occurred (as well as a description of the corrective action taken) and the dates that emission data was not collected and the f-factor was utilized in calculations. The facility will be required to comply with all applicable sections of this subpart

Section 60.49b(h) requires that for units subject to the NO_x standard of section 60.44b, an excess emission report be submitted. The facility will be required to submit such a report.

Section 60.49b(r)(1) requires that fuel receipts showing that the fuel used meets the section 40.41b definition of natural gas be kept. Such receipts are maintained.

40 CFR Part 60 Subpart Dc:

This subpart applies to the units rated at 100 MMBtu/hr or less. The facility includes the following subject units:

- N-1276-1 (93 MMBtu/hr PUC-regulated natural gas fired boiler)
- N-1276-2 (93 MMBtu/hr PUC-regulated natural gas or propane fired boiler)
- N-1276-15 (98 MMBtu/hr PUC-regulated natural gas fired boiler)

Notes: LPG meets the section 60.41b definition of natural gas.

At the time these ATC's are implemented, PUC quality natural gas will be the only remaining permitted fuel.

Compliance for these units is addressed in the Application Review document for project N-1091731 and need not be readdressed.

Rule 4002 National Emission Standards for Hazardous Air Pollutants

40 CFR Part 63 Subpart DDDDD

This subpart applies to boilers located at Major HAP Sources. As shown in section VIII (Rule 2520 Compliance), the facility is not a Major HAP Source. Therefore, this subpart does not apply. Additionally, this subpart was vacated in July of 2007.

Rule 4101 Visible Emissions

As long as the equipment is properly maintained and operated, the visible emissions are not expected to exceed 20% opacity for a period or periods aggregating more than 3 minutes in any one hour. Compliance with the provisions of this rule is expected.

Rule 4102 Nuisance

A. California Health & Safety Code 41700 (Risk Management Review)

A Risk Management Review (RMR) was conducted by the Technical Services Division of the SJVAPCD. As shown on the RMR summary included in Appendix C of this document, the cancer risk and the hazard indices were shown to be zero. Since the individual cancer risk will be less than 1 in 1 million and the hazard indices are less than 1, the project is approvable.

B. Toxics BACT (T-BACT)

As shown on the RMR summary included in appendix C of this document, T-BACT is not required.

Rule 4201 Particulate Matter Concentration

This rule limits the particulate matter emissions from each emission point to 0.1 gr/dscf of flow.

N-1276-1, N-1276-2, N-1276-3, N-1276-8, N-1276-9 & N-1276-15:

Compliance with the requirements of this rule is addressed in the Application Review documents for project N-1091731 and need not be readdressed.

N-1276-18-0:

EF_{PM10}: 0.0076 lb/MMBtu
Rating: 180 MMBtu/hr
Exhaust Flow: 62,216 cfm (Applicant)

$$PE = (0.0076 \text{ lb/MMBtu})(180 \text{ MMBtu/hr}) = 1.4 \text{ lb/hr}$$

$$\text{Concentration} = (1.4 \text{ lb/hr})(7,000 \text{ gr/lb})(1 \text{ hr}/60 \text{ min})(\text{min}/62,216 \text{ ft}^3) = 0.003 \text{ gr/ft}^3$$

The unit is expected to comply with the PM limit of 0.1 gr/dscf of exhaust flow

Rule 4304 Equipment Tuning Procedure for Boilers, Steam Generators and process Heaters

Rule 4320 requires that the units be periodically tuned and requires that the tune-ups be performed in accordance with section 5.2.1 of this rule. Section 5.2.1 requires that all tune-ups be performed in accordance with Rule 4304. The necessary conditions will be included on the Authority to Construct and the Permit to Operate.

Rule 4305 Boilers, Steam Generators and Process Heaters – Phase 2

Pursuant to Section 2.0 of District Rule 4305, this unit is subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters – Phase 2*.

Since the requirements of District Rule 4320 are either equivalent or more stringent than the requirements of District Rule 4305, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4305. Therefore, no further discussion is required.

Rule 4306 Boilers, Steam Generators and Process Heaters – Phase 3

Pursuant to Section 2.0 of District Rule 4306, this unit is subject to District Rule 4306, *Boilers, Steam Generators and Process Heaters – Phase 3*.

Since the requirements of District Rule 4320 are either equivalent or more stringent than the requirements of District Rule 4306, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4306. Therefore, no further discussion is required.

Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators and Process heaters Greater Than 5.0 MMBtu/hr

Applicability:

The rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator or process heater with a heat input rating of greater than 5 MMBtu/hr.

All of the units currently under consideration are boilers rated at more than 5 MMBtu/hr. Therefore, all of the units are subject to this rule.

Emission Limits:

NOx Limit:

All of the units are rated at more than 20 MMBtu/hr and are therefore subject to the Category B NOx emission limit of Table 1. That limit is 7 ppmvd @ 3% O₂ or 0.008 lb/MMBtu. The applicant is proposing to limit the NOx emissions from each unit to that level (or below), therefore, compliance with the NOx emission limit of this rule is expected.

CO Limit:

Per section 5.2.1, the CO emission limit is 400 ppmvd @ 3% O₂. The applicant is proposing CO limits of much less than this, therefore, compliance with the CO emission limit of this rule is expected.

Start-Up Period Emissions:

Section 5.6 of this rule states that neither the Section 5.2 (Table 1) NOx emission standard or the section 5.5.2 CO emission standard apply during start-up and shutdown periods provided the duration of no start-up or shutdown event is longer than 2 hours and the emissions are controlled to the maximum extent possible during these periods. For unit N-1276-18, the applicant has proposed to be permitted for one start-up period per day, during which, the NOx and CO emissions would exceed the applicable levels. The proposed duration is 0.5 hr/day. No shut-down period allowance was proposed.

Control Requirements:

Particulate Matter Control:

Section 5.1.1 requires that particulate matter be controlled by one of the methods specified in sections 5.4.1.1 through 5.4.1.4.

Section 5.4.1.1 states that compliance may be met by operating the units solely on PUC-quality natural gas, commercial propane, butane, liquefied petroleum gas, or a combination of such gasses. The applicant is proposing to fire the units

solely on natural gas, therefore compliance with the particulate matter control requirement of this rule is expected.

Monitoring:

NO_x, CO and O₂ Monitoring:

Section 5.7.1 requires the operator of a unit subject to section 5.2 of this rule to install and maintain Continuous Emission Monitoring (CEM) equipment for NO_x, CO and O₂, or to conduct alternate District approved monitoring.

N-1276-1, N-1276-2 and N-1276-15:

To satisfy the applicable monitoring requirements, the applicant is proposing to continue with the monthly monitoring of NO_x, CO, ammonia and O₂. NO_x, CO and O₂ monitoring will be conducted utilizing a District approved portable analyzer and ammonia monitoring will be conducted utilizing Dragger tubes or another District approved equivalent method (monitoring scheme A of District Policy SSP-1105 for NO_x, CO and O₂ with additional District pre-approved monitoring for ammonia emissions).

N-1276-3, N-1276-8 and N-1276-9:

To satisfy the applicable monitoring requirements, the applicant is proposing to continue with the monitoring of the flue gas recirculation valve settings (monitoring scheme E of District Policy SSP-1105).

N-1276-18-0:

A predictive emission monitoring system (PEMS) will be utilized to monitor NO_x and CO emissions. Refer to Section VIII (Rule 4001, Subpart Db Compliance) for a discussion of emissions monitoring.

SO_x Emission Monitoring:

Facilities complying with sections 5.4.1.1 or 5.4.1.2 of this rule are required by section 5.7.6.1 to provide a fuel analysis to the District on at least an annual basis. The units currently under consideration will fire solely on PUC quality natural gas and are therefore subject to section 5.4.1.1.

Per District Policy APR 1720, the District assumes that natural gas has a sulfur content not exceeding 1.0 grain/100 scf. Therefore, the District will accept analyses or other equivalent certification documents from the fuel supplier for demonstrating compliance with the SO_x emission monitoring requirement. The following condition will be included on the permit:

On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this

*requirement, provided they establish the fuel parameters mentioned above.
[District Rule 4320]*

Record Keeping:

Section 6.1.3 requires the operator to maintain the records necessary to verify that the required tune-ups have been conducted and that the operational characteristics of the units have been monitored as required.

The units are subject to the tune-up requirements of section 6.3.1.1. Per section 6.1.3 of this rule, the records necessary to show that the required tune-ups were performed will be required.

Section 6.1.3 also requires the operator to monitor relevant operational characteristics of the units to ensure that the emission limits of section 5.2 are met during 36-month source testing intervals. The monitoring requirements are discussed above and records of that monitoring will be required.

Section 6.1.4 requires that records of the duration of each start-up and shut-down period be kept. Such records will be required.

Section 6.1 requires that all records be maintained for a period of at least 5 years and that they be made available to the District and to the EPA upon request. Such record retention will be required by the Authorities to Construct and the Permits to Operate.

Source Testing:

Section 6.3.1 of this rule requires that the subject units be source tested to determine compliance with the applicable emission limits of this rule at least once every 12 months. Once compliance is shown on two consecutive 12-month tests, the testing frequency may decrease to once every 36 months. This section further states that if compliance is not shown during a 36 month test, the testing frequency shall revert to once every 12 months. The ATC's and the PTO's will require that testing be conducted at this frequency.

Section 6.2 of this rule specifies the source test methods that may be utilized. The ATC's and the PTO's will include conditions specifying the test methods to be used.

Tune-ups:

N-1276-1, N-1276-2 and N-1276-15:

Periodic emission monitoring will be conducted utilizing Scheme A of District Policy SSP-1105. Therefore, per Section 6.3.1.2 of this rule, tune-ups are not required.

N-1276-3, N-1276-8 and N-1276-18:

Section 6.3.1.1 requires that during each 36 month source testing interval, the units be tuned in accordance with the provisions of section 5.5.1 of this rule. Section 5.5.1 specifies the frequency, requires that the tune-ups be conducted by a qualified technician and requires they be performed in accordance with District Rule 4304. The conditions necessary to enforce the applicable tuning requirements will be included on the ATC's and the PTO's.

Rule 4351 Boilers, Steam Generators and Process Heaters – Phase 1

This rule applies to units located at Major Sources of NOx. The facility was previously, but is not currently a Major Source for NOx. However, when the District's attainment status for ozone shifts to Extreme, the Major Source threshold for NOx will decrease such that the facility will once again be a Major Source. Since the attainment designation shift will occur in the very near-term, the permits will continue to require compliance with this rule.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

California Health & Safety Code 42301.6 (School Notice)

The equipment will not be located within 1,000 feet of a K-12 school, therefore, a school notice is not required.

IX. Recommendation

Issue Authorities to Construct with the conditions on the attached Draft Authorities to Construct.

X. Billing Information

Premodification:

Permit #	Description	Fee Schedule
N-1276-1-11	93 MMBtu/hr	3020-H
N-1276-2-12	93 MMBtu/hr	3020-H
N-1276-3-11	156 MMBtu/hr	3020-H
N-1276-8-5	182.5 MMBtu/hr	3020-H
N-1276-9-5	182.5 MMBtu/hr	3020-H
N-1276-15-2	98 MMBtu/hr	3020-H

Post modification:

Permit #	Description	Fee Schedule
N-1276-1-12	93 MMBtu/hr	3020-H
N-1276-2-13	93 MMBtu/hr	3020-H
N-1276-3-12	156 MMBtu/hr	3020-H
N-1276-8-6	182.5 MMBtu/hr	3020-H
N-1276-9-6	182.5 MMBtu/hr	3020-H
N-1276-15-3	98 MMBtu/hr	3020-H
N-1276-18-0	180 MMBtu/hr	3020-H

Appendices

- Appendix A: Draft ATC's
- Appendix B: Current PTO's
- Appendix C: RMR, Ambient Air Quality Analysis Summaries
- Appendix D: Top-Down BACT Analysis (N-1276-18-0)

Appendix A
Draft ATC's

Appendix B
Current PTO's

Appendix C
RMR and Ambient Air Quality Analysis Summaries

**Appendix D
Top-Down BACT Analysis
(N-1276-18-0)**

BACT guideline 1.1.2 applies to the proposed unit (N-1276-18-0).

NOx:

The current District BACT policy states that if an applicable guideline is included in the BACT Clearinghouse, then information from that guideline should be utilized without further analysis. However, this guideline does not properly reflect the new NOx requirements of District Rule 4320. It is currently District practice to consider 7 ppmvd NOx @ 3% O₂ as the Achieved-in-Practice level and 5 ppmvd NOx @ 3% O₂ as the Technologically Feasible level.

CO, VOC, SOx and PM10:

Guideline 1.1.2 still applies, as currently written, to these pollutants. Therefore, in accordance with the current District BACT policy, information from that guideline will be utilized without further analysis.

BACT analysis for NOx:

NOx emissions are generated by the burning of fuel.

Step 1 - Identify All Possible Control Technologies

7 ppmvd NOx @ 3% O₂ or 0.008 lb/MMBtu

5 ppmvd NOx @ 3% O₂ or 0.0062 lb/MMBtu

Step 2 - Eliminate Technologically Infeasible Options

The above listed emission levels are technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. 7 ppmvd NOx @ 3% O₂ or 0.008 lb/MMBtu.

2. 5 ppmvd NOx @ 3% O₂ or 0.0062 lb/MMBtu

Step 4 - Cost Effectiveness Analysis:

The applicant has proposed to meet the most stringent NOx level. Therefore, a cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for NOx will be a NOx emission level of 5 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu.

BACT analysis for CO:

CO is generated by partial combustion of the fuel.

Step 1 - Identify All Possible Control Technologies

1. Natural gas fuel with LPG back up

Step 2 - Eliminate Technologically Infeasible Options:

The above listed control technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. Natural gas fuel with LPG back up

Step 4 - Cost Effectiveness Analysis:

The above listed item is achieved in practice and is required regardless of cost. A cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for CO will be natural gas fuel with LPG back up. The applicant is proposing the use of natural gas fuel, therefore, BACT will be satisfied.

BACT analysis for VOC:

VOC emissions are generated by the burning of fuel.

Step 1 - Identify All Possible Control Technologies

1. Natural gas fuel with LPG back up

Step 2 - Eliminate Technologically Infeasible Options:

The above listed control technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. Natural gas fuel with LPG back up

Step 4 - Cost Effectiveness Analysis:

The above listed item is achieved in practice and is required regardless of cost. A cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for VOC will be natural gas fuel with LPG back up. The applicant is proposing the use of natural gas fuel, therefore, BACT will be satisfied.

BACT analysis for SOx:

VOC emissions are generated by the burning of fuel.

Step 1 - Identify All Possible Control Technologies

1. Natural gas fuel with LPG back up

Step 2 - Eliminate Technologically Infeasible Options:

The above listed control technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. Natural gas fuel with LPG back up

Step 4 - Cost Effectiveness Analysis:

The above listed item is achieved in practice and is required regardless of cost. A cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for SOx will be natural gas fuel with LPG back up. The applicant is proposing the use of natural gas fuel, therefore, BACT will be satisfied.

BACT analysis for PM10:

VOC emissions are generated by the burning of fuel.

Step 1 - Identify All Possible Control Technologies

1. Natural gas fuel with LPG back up

Step 2 - Eliminate Technologically Infeasible Options:

The above listed control technology is technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control effectiveness

1. Natural gas fuel with LPG back up

Step 4 - Cost Effectiveness Analysis:

The above listed item is achieved in practice and is required regardless of cost. A cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for PM10 will be natural gas fuel with LPG back up. The applicant is proposing the use of natural gas fuel, therefore, BACT will be satisfied.