



MAR 23 2011

Matthew Frank  
JR Simplot  
PO Box 128  
Helm, CA

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-705  
Project # C-1061386**

Dear Mr. Frank:

The District has issued the Final Renewed Title V Permit for JR Simplot. The preliminary decision for this project was made on November 18, 2010. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Attachments

cc: Brian Clements, Permit Services Engineer

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**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  
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**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



MAR 23 2011

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-705  
Project # C-1061386**

Dear Mr. Rios:

The District has issued the Final Renewed Title V Permit for JR Simplot. The preliminary decision for this project was made on November 18, 2010. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Attachments

cc: Brian Clements, Permit Services Engineer

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**MAR 23 2011**

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

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-705  
Project # C-1061386**

Dear Mr. Tollstrup:

The District has issued the Final Renewed Title V Permit for JR Simplot. The preliminary decision for this project was made on November 18, 2010. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Attachments

cc: Brian Clements, Permit Services Engineer

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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Fresno Bee

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT  
NOTICE OF FINAL DECISION TO ISSUE  
RENEWED FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the renewed Federally Mandated Operating Permit to JR Simplot for its fertilizer production facility in Helm, California.

The District's analysis of the legal and factual basis for this proposed action, project #C-1061386, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. For additional information regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

## Final Title V Permit Renewal Evaluation JR Simplot Company C-705

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# TITLE V PERMIT RENEWAL EVALUATION

*Fertilizer Production Facility*

**Processing Engineer:** Brian Clements  
**Lead Engineer:** Sheraz Gill  
**Date:** March 15, 2011

**Facility Number:** C-705  
**Facility Name:** JR Simplot  
**Mailing Address:** PO Box 128  
Helm, CA 93627

**Contact 1 Name:** Nathaniel Rutterbush - EHS&S Specialist  
**Office Phone:** (559) 866-5681 x16  
**Mobile Phone:** (559) 829-7517  
**Fax:** (559) 866-1507  
**E-Mail:** [nathaniel.rutterbush@simplot.com](mailto:nathaniel.rutterbush@simplot.com)

**Contact 2 Name:** Matthew Frank - Production Manager  
**Office Phone:** (559) 866-5681  
**Fax:** (559) 866-1507  
**E-Mail:** [matthew.frank@simplot.com](mailto:matthew.frank@simplot.com)

**Contact 4 Name:** Burl Ackerman - Environmental Engineering Manager  
**Office Phone:** (208) 389-7466  
**Mobile Phone:** (208) 340-8330  
**E-Mail:** [burl.ackerman@simplot.com](mailto:burl.ackerman@simplot.com)

**Responsible Official:** Matthew Frank  
**Title:** Production Manager

**Project #:** C-1061386  
**Deemed Complete:** May 17, 2006

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## I. PROPOSAL

JR Simplot Company was issued a Title V permit on October 6, 2000. As required by District Rule 2520, the facility is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The facility has applied for a minor modification to convert Authority to Construct (ATC) permit C-705-3-5. The proposed modification is to remove the reference to 200 TPD 100% HNO<sub>3</sub> from the equipment description and move (from permit condition #1) one 6.87 MMBtu/hr natural gas fired catalyst preheater and one 17,000 gallon tank for collection of weak nitric acid to the equipment description. The proposed modifications will be incorporated in the Title V operating permit within this Title V renewal project.

The facility has applied for a minor modification to convert Authority to Construct (ATC) permit C-705-5-7. The proposed modification is to lower the PM<sub>10</sub> emission limit from 0.0366 lb-PM<sub>10</sub>/ton to 0.001 lb-PM<sub>10</sub>/ton and to lower the annual ammonium phosphate production limit from 219,000 ton/year to 120,000 ton/year. The proposed modifications will be incorporated in the Title V operating permit within this Title V renewal project.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

The preliminary decision for this project was made on November 18, 2010. Based on a comment by the applicant, and approval by the EPA, the recordkeeping condition below was updated as follows:

**Draft Condition:**

- The permittee shall maintain monthly records of the type of fuel purchased, the sulfur content of the fuel, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Y

**Revised Condition:**

- The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Y

A complete discussion of the comment, including the basis for the revision is included in Attachment G.

## II. FACILITY LOCATION

This JR Simplot facility is located at 12688 Cole Ave. in Helm, CA.

## III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment D.

## IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to not use any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of general permit templates.

## V. SCOPE OF EPA AND PUBLIC REVIEW

As mentioned in Section IV above, the applicant is requesting to not use any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of general permit templates. Therefore, the proposed permit in its entirety is subject to EPA and public review.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated

- District Rule 2020, Exemptions (amended December 19, 2002 - SIP Approved, amended September 21, 2006, amended December 20, 2007)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended December 19, 2002 - SIP Approved, amended April 20, 2005, amended December 15, 2005, September 21, 2006)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001 - SIP Approved)
- District Rule 4101, Visible Emissions (amended February 17, 2005 - SIP Approved)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters - Phase 2 (amended August 21, 2003 - SIP Approved)



- District Rule 4351, Boilers, Steam Generators, and Process Heaters - Phase 1 (amended August 21, 2003 - SIP Approved)
- District Rule 4601, Architectural Coatings (amended October 31, 2001 - SIP Approved)
- District Rule 4701, Internal Combustion Engines - Phase 1 (amended August 21, 2003 - SIP Approved)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subpart B and F, Stratospheric Ozone
- 40 CFR Part 68, Chemical Accident Prevention Provisions

#### **B. Rules Removed**

- District Rule 8020, 8030, and 8060, Fugitive Dust (PM<sub>10</sub>) Emissions (amended April 25, 1996)

These rules were removed on November 15, 2001, and were replaced with District Rules 8021, 8031, and 8061.

#### **C. Rules Added**

- District Rule 4306, Boilers, Steam Generators, and Process Heaters - Phase 3 (adopted September 18, 2003, amended March 17, 2005 - SIP Approved, last amended October 16, 2008)
- District Rule 4320, Advanced Emission Reduction Options For Boilers, Steam Generators, And Process Heaters Greater Than 5.0 MMBtu/hr (Adopted October 16, 2008)
- District Rule 4702, Internal Combustion Engines - Phase 2 (adopted August 21, 2003, amended June 15, 2005, amended April 20, 2006, amended January 18, 2007 - SIP Approved)
- District Rule 8011, General Requirements (adopted November 15, 2001, amended August 19, 2004 - SIP Approved)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (adopted November 15, 2001, amended August 19, 2004 - SIP Approved)

- District Rule 8031, Bulk Materials (adopted November 15, 2001, amended August 19, 2004 - SIP Approved)
- District Rule 8041, Carryout and Trackout (adopted November 15, 2001, amended August 19, 2004 - SIP Approved)
- District Rule 8051, Open Areas (adopted November 15, 2001, amended August 19, 2004 - SIP Approved)
- District Rule 8061, Paved and Unpaved Roads (adopted November 15, 2001, amended August 19, 2004 - SIP Approved)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (adopted November 15, 2001, amended August 19, 2004 - SIP Approved)
- 17 CCR 93115, California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 7.5, Measure 93115 (adopted December 8, 2004)

#### **D. Rules Not Updated**

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1081, Stack Monitoring (amended December 17, 1992)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)

- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- 40 CFR 60, Subpart G, Standards for Nitric Acid Plants
- 40 CFR 64, Compliance Assurance Monitoring (CAM)

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

### A. Rules Added

- None

### B. Rules Not Updated

- District Rule 1160, Emission Statements  
(amended November 18, 1992)

For this facility, condition 3 of the requirements for draft PTO C-705-0-2 are based on this rule and is not Federally Enforceable through Title V.

- District Rule 4102, Nuisance  
(amended December 17, 1992)

For this facility, the following conditions are based on this rule and are not Federally Enforceable through Title V:

Draft Permit	Condition #'s
C-705-0-2	41

## VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section serves to address rules that have been amended or added since the issuance of the initial Title V permit. This section will also address rules not adequately addressed in the initial Title V project.

The renewed PTOs were also revised, if applicable, by removing the county rule references for the counties other than the one the facility is actually located in or by removing all county references as obsolete due to a governing District rule contained in the SIP. The following updated conditions reflect correct references:

- Conditions 1, 2, 4, and 22 on the draft facility-wide PTO (C-705-0-2).
- Condition 10 on draft PTO C-705-1-6.
- Condition 7 on draft PTO C-705-3-4.
- Condition 5 on draft PTO C-705-10-2.

### A. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

### B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

However, as part of this Title V renewal, several Authority to Construct (ATC) permits recently issued will be incorporated into the Title V permit. The Rule 2201 condition updates are as follows:

Permit Unit C-705-3 (Nitric Acid Plant):

The proposed modification is to remove reference to the 200 TPD 100% HNO<sub>3</sub> limit from the equipment description and move (from permit condition #1) one 6.87 MMBtu/hr natural gas fired catalyst preheater and one 17,000 gallon tank for collection of weak nitric acid to the equipment description. NSR references were also added where applicable.

Per ATC '3-5, the permit equipment description has been changed from:

50.3 MMBTU/HR NITRIC ACID PLANT, 200 TPD 100% HNO<sub>3</sub>, WITH STEAM TURBINE, AIR COMPRESSOR, TAIL GAS EXPANDER, AMMONIA VAPORIZER AND SUPERHEATER, CONVERTER (NH<sub>3</sub> TO NO) AND TAIL GAS HEATER, ABSORBER (NO TO HNO<sub>3</sub>), AND COMBUSTOR (NO<sub>2</sub> TO N<sub>2</sub>) FOR EMISSIONS.

To:

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH<sub>3</sub> TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO<sub>3</sub> ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO<sub>2</sub> TO N<sub>2</sub> BUTANE FIRED COMBUSTOR FOR EMISSIONS, AND ONE 17,000 GALLON TANK FOR COLLECTION OF WEAK ACID

- Condition 1 of the current PTO '3-3 has been removed according to ATC '3-5.
- ATC C-705-3-5, condition 1 is not included on draft PTO C-705-3-4 since it is administrative and has been satisfied.

Permit Unit C-705-5 (Liquid Ammonium Phosphate unit):

The proposed modifications are to lower PM<sub>10</sub> emission limit from 0.0366 lb-PM<sub>10</sub>/ton to 0.001 lb-PM<sub>10</sub>/ton and lower annual ammonium phosphate

production limit from 219,000 ton/year to 120,000 ton/year. NSR references were also added where applicable.

- ATC C-705-5-7, conditions 1 and 2 are not included on draft PTO C-705-5-4 since they are administrative and have been satisfied.
- ATC C-705-5-7, condition 3 is not included on draft PTO C-705-5-4 since it is included on the facility-wide requirements.
- ATC C-705-5-7, conditions 11 and 12 are included on draft PTO C-705-5-4 as conditions 8 and 9. These conditions replace conditions 8 and 9 from the current PTO C-705-5-6.

**C. District Rule 2520 - Federally Mandated Operating Permits**

This rule was amended to incorporate several administrative corrections, clarify rule language, and add procedures for implementing compliance schedules. The only amendments to this rule that will have an effect on current permit requirements are the corrections to Section 9 rule references, as described in the following table:

<b>Old Rule Section</b>	<b>Corrected Rule Section</b>
9.3	9.2
9.4	9.3
9.5	9.4
9.6	9.5
9.7	9.6
9.8	9.7
9.9	9.8
9.10	9.9
9.11	9.10
9.12	9.11
9.13	9.12
9.14	9.13
9.15	9.14
9.16	9.15
9.17	9.16
9.18	9.17
9.19	9.18

Rule 2520, Section 6.4.4, "Other Changes Not Requiring Title V Permit Amendment," allowed the permittee to implement changes, including the addition of new emissions units, without triggering the permit modification or

amendment requirements until the time of Title V permit renewal, provided the conditions described in Sections 6.4.4.1 through 6.4.4.2 were met.

a. All Permits:

- Mapping or identification of specific permit conditions that have been updated is due to the change in the reference section is not necessary. Every Rule 2520 section reference on each draft permit has been updated according to the table above.

**D. District Rule 4101 - Visible Emissions**

District Rule 4101 has been submitted to the EPA to replace SIP approved Rule 401 (all counties of the SJVUAPCD). EPA made a preliminary determination that District Rule 4101 is "more stringent" than the county versions previously referenced, per correspondence dated August 20, 1996.

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

Permit Unit C-705-0-2:

- Condition 22 of the requirements of this revised facility wide permit will assure that all of the equipment at this facility complies with the requirements of this rule.

**E. District Rule 4305 - Boilers, Steam Generators, and Process Heaters – Phase 2**

The purpose of this rule is to limit emissions of oxides of nitrogen (NOx) and carbon monoxide (CO) from the operation of boilers, steam generators, and process heaters greater than 5 MMBtu/hr.

Permit Unit C-705-1 (71.4 MMBtu/hr boiler)

The unit is natural gas-fired with a maximum heat input of 71.4 MMBtu/hr. Pursuant to Section 2.0 of District Rule 4305, the unit is subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters – Phase 2*.

In addition, the unit is also subject to District Rule 4306, *Boilers, Steam Generators and Process Heaters – Phase 3*.

Since the emissions limits of District Rule 4306 and all other requirements are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4306 requirements will satisfy requirements of District Rule 4305. See **Attachment E** for the stringency comparison of these two rules.

**F. District Rule 4306 - Boilers, Steam Generators, and Process Heaters - Phase 3 (version October 16, 2008 - not SIP approved)**

The purpose of this rule is to limit emissions oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from the operation of boilers, steam generators, and process heaters greater than 5 MMBtu/hr.

Permit Unit C-705-1 (71.4 MMBtu/hr boiler)

**Section 5.1, NO<sub>x</sub> and CO Requirements**

Since the maximum heat input of the unit will be limited to less than 9 billion Btu/year, the unit is subject to Section 5.2 of District Rule 4306, and will not be subject to the requirements of Section 5.1.

**Section 5.2, Low Use**

For a unit that is limited to less than 9 billion Btu heat input per calendar year pursuant to a Permit to Operate, the operator shall comply with the requirement of Section 7.4 and one of the following:

- tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). 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; or
- operate the unit in a manner that maintains exhaust oxygen concentrations at less than or equal to 3.00 percent by volume on a dry basis; or
- operate the unit in compliance with the applicable emission limits of Sections 5.1.1 or 5.1.2.

The following conditions apply:

- The maximum heat input to the unit shall not exceed 9 billion Btu per calendar year. [District Rules 4305, 4306, and 4351] Y



- Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 4305, 4306, and 4351] Y
- Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4305, 4306, and 4351] Y
- 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 4305, 4306, and 4351] Y

### **Section 5.3, Start-up and Shut Down**

Since the unit is not subject to Sections 5.1, 5.2.2 or 5.2.3, the requirements of this section does not apply to the unit.

### **Section 5.4, Monitoring Provisions**

Pursuant to Section 5.4.1 and 5.4.2, since the unit is not subject to Sections 5.1, it is not subject to the requirements of these sections.

As such, the existing monitoring conditions 14-17 will be removed from the current PTO.

Pursuant to Section 5.4.3, since the applicant is utilizing the tune-up option, monthly monitoring of the operational characteristics is required. A permit condition will be listed on the permit as follows:

- The permittee shall monitor, at least on a monthly basis, the amount of water use, the amount of unit blow down, and the exhaust stack temperature or other operational characteristics recommended by the unit manufacturer. 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 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]

Pursuant to Section 5.4.4, the operator of any unit subject to Section 5.2.1 or 5.2.2 shall install and maintain an operational non-resettable, totalizing mass or

volumetric flow meter in each fuel line to each unit. Volumetric flow measurements shall be periodically compensated for temperature and pressure. A master meter, which measures fuel to all units in a group of similar units, may satisfy these requirements if approved by the APCO in writing. The cumulative annual fuel usage may be verified from utility service meters, purchase or tank fill records, or other acceptable methods, as approved by the APCO.

Therefore, a permit condition will be listed as follows:

- Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 4305, 4306, and 4351]

### **Section 5.5, Compliance Determination**

The applicant proposed to limit the total heat input to the unit to less than 9 billion Btu/yr. As discussed above, the unit is not subject to the requirements of Sections 5.1, and therefore is not subject to the requirements of this section.

### **Section 6.1, Recordkeeping**

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.3 shall be maintained for five calendar years and shall be made available to the APCO upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.

A permit condition will be listed on the permit as follows:

- All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4305, 4306, and 4351]

Section 6.1.2 requires that the operator of a unit subject to Section 5.2 shall record the amount of fuel use at least on a monthly basis.

A permit condition will be listed on the permit as follows:

- {2981} Records of monthly and annual heat input of the unit shall be maintained. [District Rules 4305, 4306, and 4351]

Section 6.1.3 requires that the operator of a unit subject to Section 5.2.1 or 3.3.1 shall maintain records to verify that the required tune-up and the required monitoring of the operational characteristics have been performed.

A permit condition will be listed on the permit as follows:

- Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306]

### **Section 6.3, Compliance Testing**

Since the unit is not subject to the requirements of Sections 5.1 or 5.2.3, it is not subject to the requirements of this section. As such, source testing is not required per this rule, and the source testing conditions 7-13, and 26 will be removed from the current PTO.

#### **G. District Rule 4306 - Boilers, Steam Generators, and Process Heaters - Phase 3 (version March 17, 2005 - SIP approved)**

The purpose of this rule is to limit emissions oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from the operation of boilers, steam generators, and process heaters greater than 5 MMBtu/hr.

##### **Permit Unit C-705-1 (71.4 MMBtu/hr boiler)**

Since the emissions limits and all other requirements of the latest version of this rule are equivalent or more stringent than this older SIP-approved version, compliance with the new version satisfies the requirements of the older SIP-approved version. See **Attachment F** for the stringency comparison of these two rules.

#### **H. District Rule 4320 - Advanced Emission Reduction Options For Boilers, Steam Generators, And Process Heaters Greater Than 5.0 MMBtu/Hr**

Per Section 5.2, Table 1, Units that were installed prior to January 1, 2009 and limited by a Permit to Operate to an annual heat input >1.8 billion Btu/year but < 30 billion Btu/year are required to meet 9 ppmvd-NO<sub>x</sub> and apply for an ATC to do so no later than 1/1/13. As such, there are no Rule 4320 requirements at this time.

#### **I. District Rule 4351 - Boilers, Steam Generators, And Process Heaters – Phase 1**

This rule applies to any boiler, steam generator or process heater, with a rated heat input greater than 5 million Btu per hour that is fired with gaseous and/or liquid fuels, and is included in a Major NO<sub>x</sub> source. This JR Simplot facility is a Major Source for NO<sub>x</sub> emissions, as last demonstrated in project C-1081235.

Permit Unit C-705-1 (71.4 MMBtu/hr boiler)

**Section 5.1, NO<sub>x</sub> and CO Requirements**

Since the maximum heat input of the unit will be limited to less than 9 billion Btu/year, the unit is subject to Section 5.3, and will not be subject to the emission requirements of this rule (Section 5.1).

**Section 5.3, Low Use**

For a unit that is limited to less than 9 billion Btu heat input per calendar year pursuant to a Permit to Operate, the operator shall comply with the requirement of Section 7.4 and one of the following:

- tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). 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; or
- operate the unit in a manner that maintains exhaust oxygen concentrations at less than or equal to 3.00 percent by volume on a dry basis; or
- operate the unit in compliance with the applicable emission limits of Sections 5.1.1 or 5.1.2.

The following conditions apply:

- The maximum heat input to the unit shall not exceed 9 billion Btu per calendar year. [District Rules 4305, 4306, and 4351] Y
- Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rules 4305, 4306, and 4351] Y
- Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4305, 4306, and 4351] Y
- 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 4305, 4306, and 4351] Y

### **Section 5.7, Compliance Determination**

The applicant proposed to limit the total heat input to the unit to less than 9 billion Btu/yr. As discussed above, the unit is not subject to the requirements of Sections 5.1, and therefore is not subject to the requirements of this section.

### **Section 6.1, Recordkeeping**

Section 6.1 requires that the records shall be maintained for five calendar years and shall be made available to the APCO upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.

A condition will be listed on the draft PTO as follows:

- All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4305, 4306, and 4351]

Section 6.1.1 requires that the operator record the cumulative amount of fuel use for each unit.

A permit condition will be listed on the permit as follows:

- {2981} Records of monthly and annual heat input of the unit shall be maintained. [District Rules 4305, 4306, and 4351]

### **Section 6.3, Compliance Testing**

Since the unit is subject to Section 5.3, it is not subject to the requirements of this section. As such, source testing is not required per this rule, and the source testing conditions 7-13, and 26 will be removed from the current PTO.

## **J. District Rule 4601 - Architectural Coatings**

This rule limits the emissions of VOC's from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). This rule further specifies labeling requirements, coatings thinning recommendations, and storage requirements.

The following changes were included in the latest rule amendment that resulted in adding new permit requirements and/or revising current permit requirements:

- The tables outlining the VOC content of different specialty coatings has been largely replaced with the Table of Standards in Section 5.0.
- New labeling, reporting, test methodology and other requirements have been incorporated into the rule in order to allow ARB to administer the Averaging Program as detailed in Section 8.0.

The following permit requirements were added and/or revised to ensure compliance with this rule:

Permit Unit C-705-0-2 (Facility-Wide Conditions)

- Conditions 23 thru 27 of the requirements for the draft facility-wide permit will assure compliance with the requirements of this rule. These conditions replace conditions 23 thru 27 of the existing facility-wide permit (C-705-0-1).

**K. District Rule 4701 - Internal Combustion Engines - Phase 1**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. This rule applies to any internal combustion engine with a rated brake horsepower greater than 50 horsepower and that requires a Permit-to-Operate (PTO).

Permit Unit C-705-2 (469 bhp diesel-fired emergency IC engine):

Per Rule 4702, this rule does not apply to emergency diesel-fired IC engines as of June 1, 2006, if the engine satisfies Rule 4702. The engine is in full compliance with Rule 4702; therefore, all references to Rule 4701 will be removed from this permit unit, as shown in draft PTO C-705-2-2.

Permit Unit C-705-10 (469 bhp diesel-fired emergency IC engine):

Per Rule 4702, this rule does not apply to emergency diesel-fired IC engines as of June 1, 2006, if the engine satisfies Rule 4702. The engine is in full compliance with Rule 4702; therefore, all references to Rule 4701 will be removed from this permit unit, as shown in draft PTO C-705-10-2.

Permit Unit C-705-14 (1,086 bhp diesel-fired emergency IC engine):

Per Rule 4702, this rule does not apply to emergency diesel-fired IC engines as of June 1, 2006, if the engine satisfies Rule 4702. The engine is in full compliance with Rule 4702; therefore, all references to Rule 4701 will be removed from this permit unit, as shown in draft PTO C-705-14-2.

**L. District Rule 4702 - Internal Combustion Engines - Phase 2**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. Except as provided in Section 4.0, the provisions of this rule apply to any internal combustion engine, rated greater than 50 bhp, that requires a Permit to Operate (PTO).

Pursuant to Section 4.2, except for the requirements of Sections 5.7 and 6.2.3, the requirements of this rule shall not apply to an internal combustion engine that meets the following condition:

- An emergency standby engine as defined in Section 3.0 of this rule, and provided that it is operated with a nonresettable elapsed operating time meter. In lieu of a nonresettable time meter, the owner of an emergency engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Section 3.15 defines an "Emergency Standby Engine" as an internal combustion engine which operates as a temporary replacement for primary mechanical or electrical power during an unscheduled outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the operator. An engine shall be considered to be an emergency standby engine if it is used only for the following purposes: (1) periodic maintenance, periodic readiness testing, or readiness testing during and after repair work; (2) unscheduled outages, or to supply power while maintenance is performed or repairs are made to the primary power supply; and (3) if it is limited to operate 100 hours or less per calendar year for non-emergency purposes. An engine shall not be considered to be an emergency standby engine if it is used: (1) to reduce the demand for electrical power when normal electrical power line service has not failed, or (2) to produce power for the utility electrical distribution system, or (3) in conjunction with a voluntary utility demand reduction program or interruptible power contract.

Therefore, the emergency standby IC engines only have to meet the requirements of Sections 5.7 and 6.2.3 of this Rule.

Section 5.7 of this Rule requires that the owner of an emergency standby engine shall comply with the requirements specified in Section 5.7.2 through Section 5.7.5 below:

- 1) Properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier.
- 2) Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.
- 3) Install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate or Stationary Equipment Registration condition. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Section 6.2.2 requires all data collected pursuant to sections 5.6 and 5.7 (monitoring) to be maintained for 5 years and readily available upon request by the APCO. The following condition will be placed on the permit.

Section 6.2.3 requires that an owner claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and submitted to the APCO upon request and at the end of each calendar year in a manner and form approved by the APCO.

The requirements of this rule are satisfied via the permit conditions identified below for each unit:

Permit Unit C-705-2 (469 bhp diesel-fired emergency IC engine):

The latest 4702 requirements have been incorporated into the draft PTO as conditions 3, 4, 6, 7, 8, and 10.

Permit Unit C-705-10 (469 bhp diesel-fired emergency IC engine):

The latest 4702 requirements have been incorporated into the draft PTO as conditions 4, 6, 7, and 9.



Permit Unit C-705-14 (1,086 bhp diesel-fired emergency IC engine):

The latest 4702 requirements have been incorporated into the draft PTO as conditions 8-12 and 14.

**M. District Rule 8011 - General Requirements**

The purpose of Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The rules contained in this regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM10 Nonattainment Areas. The rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM10 and particles larger than PM10. Controlling fugitive dust emissions when visible emissions are detected will not prevent all PM10 emissions, but will substantially reduce PM10 emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in this rule are applicable to all Rules under Regulation VIII (Fugitive PM10 Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

Conditions 31 through 36 on the draft facility-wide requirements (C-705-0-2) ensure compliance.

**N. District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities**

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities.

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule also applies to the construction of new landfill disposal sites or modification to existing landfill disposal sites prior to commencement of land filling activities.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 31 on the draft facility-wide requirements (C-705-0-2) ensures compliance.

**O. District Rule 8031 - Bulk Materials**

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials.

This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit VDE to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 32 on the draft facility-wide requirements (C-705-0-2) ensures compliance.

**P. District Rule 8041 - Carryout and Trackout**

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout.

This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that an owner/operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from paved public roads does not exempt an owner/operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

Condition 33 on the draft facility-wide requirements (C-705-0-2) ensures compliance.

**Q. District Rule 8051 - Open Areas**

The purpose of this rule is to limit fugitive dust emissions from open areas.

This rule applies to any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

Section 5.0 requires that whenever open areas are disturbed or vehicles are used in open areas, the owner/operator shall implement one or a combination of control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 34 on the draft facility-wide requirements (C-705-0-2) ensures compliance.

**R. District Rule 8061 - Paved and Unpaved Roads**

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.

This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

Condition 35 on the draft facility-wide requirements (C-705-0-2) ensures compliance.

**S. District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area**

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria.

This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

Condition 36 on the draft facility-wide requirements (C-705-0-2) ensures compliance.

**T. California Code of Regulations (CCR), Title 17 (Public Health), Division 3 (Air Resources), Chapter 1 (Air Resources Board), Subchapter 7.5 (Air Toxic Control Measures), Measure 93115 (Stationary Diesel Engines)**

**Emergency Operating Requirements:**

This regulation stipulates that no owner or operator shall operate any new or in-use stationary diesel-fueled compression ignition (CI) emergency standby engine, in response to the notification of an impending rotating outage, unless specific criteria are met.

This section applies to emergency standby IC engines that are permitted to operate during non-emergency conditions for the purpose of providing electrical power. However, District Rule 4702 states that emergency standby IC engines may only be operated during non-emergency conditions for the purposes of maintenance and testing. Therefore, this section does not apply and no further discussion is required.

This ATCM requires that no owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine (>50 bhp) that emits diesel PM at a rate greater than 0.40 g/bhp-hr more than 20 hours per year for maintenance and testing purposes. Engines powering a fire pump are exempt from 20 hours per year limitation.

The ATCM also requires that in-use emergency standby engines are required to use only diesel fuels that meet the definition of CARB diesel at the time of purchase.

The ATCM also requires that no owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine for non-emergency use, including maintenance and testing, during the following periods: a) whenever there is a school sponsored activity, if the engine is located on school grounds, and b) between 7:30 a.m. and 3:30 p.m. on days when school is in session, if the engine is located within 500 feet of school grounds. This facility is not located near any schools so these requirements are not applicable.

The ATCM also requires that owner or operator of an emergency standby diesel-fueled CI engine shall keep a monthly log of usage that shall list and document the nature of use for each of the following:

- a. Emergency use hours of operation;
- b. Maintenance and testing hours of operation;
- c. Hours of operation for any emission testing;
- d. Initial start-up hours;

- e. If applicable, hours of operation to comply with the requirements of NFPA 25;
- f. Hours of operation for all uses other than those specified above; and
- g. The fuel used.

The owner or operator shall document fuel use through the retention of fuel purchase records that account for all fuel used in the engine and all fuel purchased for use in the engine, and, at a minimum, contain the following information for each individual fuel purchase transaction:

- I. Identification of the fuel purchased as either CARB Diesel;
- II. Amount of fuel purchased;
- III. Date when the fuel was purchased;
- IV. Signature of owner or operator or representative of owner or operator who received the fuel; and
- V. Signature of fuel provider indicating fuel was delivered.

Permit Unit C-705-2 (469 bhp diesel-fired emergency generator IC engine):

The ATCM requirements have been incorporated into the draft PTO as conditions 3, 5, 6, 8, 9 and 10.

Permit Unit C-705-10 (157 bhp diesel-fired emergency fire water pump IC engine):

The ATCM requirements have been incorporated into the draft PTO as conditions 4-9.

Permit Unit C-705-14 (1,086 bhp diesel-fired emergency generator IC engine):

The ATCM requirements have been incorporated into the draft PTO as conditions 5, 8, 10, and 12-14.

**U. 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos**

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.150 of this Subpart was amended September 18, 2003, and condition 34 of the facility-wide requirements assures compliance with the requirements

**V. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone**

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2004 and 2008, and conditions 29 and 30 of the facility-wide requirements assure compliance with the requirements.

**W. 40 CFR Part 68, Chemical Accident Prevention Provisions**

This rule has been updated since the original Title V permit was issued on October 6, 2000. However, the changes do not affect the overall applicability or requirements as they are applied to sources at this facility.

- Condition 41 on the existing facility-wide requirements (C-705-0-1) remains as is, and is now shown as condition 42 on the draft facility-wide requirements (C-705-0-2) for continued compliance with this rule.

**X. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)**

**§64.2 - Applicability**

CAM is required for units that meet the following three criteria:

- (1) the unit must have an emission limit for the pollutant;
- (2) the unit must have add-on controls for the pollutant (e.g. flue gas recirculation, baghouse, or catalytic oxidizer); and
- (3) the unit must have a pre-control potential to emit of greater than the major source thresholds for that pollutant.

<b>Pollutant</b>	<b>Major Source Threshold (lb/year)</b>
VOC	50,000
NO <sub>x</sub>	50,000
CO	200,000
PM <sub>10</sub>	140,000
SO <sub>x</sub>	140,000

**Permit Units C-705-1 (71.4 MMBtu/hr boiler w/FGR)**

- (1) This unit contains an emission limit for NO<sub>x</sub> of 30 ppmvd @3% O<sub>2</sub> or 0.036 lb/MMBtu (per Rules 2201, 4305, 4306, and 4351).
- (2) This unit is equipped with Flue Gas Recirculation (FGR) for NO<sub>x</sub> control. FGR results in up to 60% control<sup>1</sup>.
- (3) Uncontrolled NO<sub>x</sub> emissions:

$$\text{Annual Uncontrolled PE} = [0.036 \text{ lb-NO}_x/\text{MMBtu} \times 9,000 \text{ MMBtu/yr} + (1-0.6)]$$

<sup>1</sup> Per [http://205.153.241.230/P2\\_Opportunity\\_Handbook/12\\_7.html](http://205.153.241.230/P2_Opportunity_Handbook/12_7.html)

Annual Uncontrolled PE = 810 lb-NOx/year

As shown above, the uncontrolled PE for NOx emissions is less than the major source threshold (50,000 lb/year). Therefore, this unit is not subject to the requirements of 40 CFR 64 for NOx.

**Permit Units C-705-2, '-10, and '-14 (Emergency IC engines)**

These units do not contain add on control devices for any pollutant; therefore, are not subject to CAM.

**Permit Unit C-705-4 (Calcium Ammonium Nitrate (CAN17) Plant)**

**CAN-17 Process:**

- (1) This unit contains the following emission limits: 0.004 lb-PM10/ton, 0.0005 lb-NH3/ton, 0.0039 lb-nitric acid/ton (per Rule 2201)
- (2) This unit is equipped by 2 scrubbers for PM10, NH3, and nitric acid control.
- (3) Uncontrolled emissions:

PM10

Where:

PE = 2.0 lb-PM10/day (per EE for 980712)

Scrubber PM10 control = 95% (per EE for 950651)

Annual Uncontrolled PE =  $[2.0 \text{ lb-PM10/day} \times 365 \text{ days/yr} \div (1-0.95)]$

Annual Uncontrolled PE = 14,600 lb-PM10/year

NH3

Where:

PE = 0.2 lb-NH3/day (per EE for 980712)

Scrubber NH3 control = 95% (per EE for 950651)

Annual Uncontrolled PE =  $[0.2 \text{ lb-NH3/day} \times 365 \text{ days/yr} \div (1-0.95)]$

Annual Uncontrolled PE = 1,460 lb-NH3/year

Nitric Acid

Where:

PE = 2.0 lb-nitric acid/day (per EE for 980712)

Scrubber nitric acid control = 95% (Conservative Estimate)

$$\text{Annual Uncontrolled PE} = [2.0 \text{ lb-nitric acid/day} \times 365 \text{ days/yr} \\ + (1-0.95)]$$

$$\text{Annual Uncontrolled PE} = 14,600 \text{ lb-nitric acid/year}$$

As shown above, the uncontrolled PE for PM10, NH3, and nitric acid emissions is less than the major source threshold for PM10 (140,000 lb/year). The major source threshold has been used for NH3 and nitric acid as the nature of those emissions are closest to PM10 compared to other pollutants with major source thresholds (SOx, CO, VOC, and NOx). Therefore, this unit is not subject to the requirements of 40 CFR 64 for any pollutant.

**Limestone Storage Silo:**

- (1) This unit contains an emission limit for PM10 of 0.02 gr/scf (per Rule 2201)
- (2) This unit is equipped with a baghouse for PM10 control.
- (3) Uncontrolled emissions:

Where:

PE = 0.1 lb-PM10/day (per EE for 980712)

Baghouse control = 99% (District Practice)

$$\text{Annual Uncontrolled PE} = [0.1 \text{ lb-PM10/day} \times 365 \text{ days/yr} + (1-0.99)]$$

$$\text{Annual Uncontrolled PE} = 3,650 \text{ lb-PM10/year}$$

As shown above, the uncontrolled PE for PM10 emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to the requirements of 40 CFR 64 for PM10.

**Permit Unit C-705-5 (Liquid Ammonium Phosphate Unit)**

- (1) This unit contains an emission limit of 0.001 lb-PM10/ton (per Rule 2201)
- (2) This unit is equipped with a scrubber for PM10 control.
- (3) Uncontrolled emissions:

Where:



PE = 120 lb-PM10/yr (per EE for 1081235)  
Scrubber control = 95% (per EE for 950651)

Annual Uncontrolled PE = [120 lb-PM10/yr ÷ (1-0.95)]

Annual Uncontrolled PE = 2,400 lb-PM10/year

As shown above, the uncontrolled PE for PM10 emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to the requirements of 40 CFR 64 for PM10.

**Permit Unit C-705-6 (Ammonium Nitrate Plant)**

- (1) This unit contains an emission limit of 0.1 grains/dscf (per Rule 4201)
- (2) This unit is equipped with a scrubber for PM10 control.
- (3) Uncontrolled emissions:

Where:

Controlled PE = 4,125 lb-PM10/yr (per EE for 1081235)  
Scrubber control = 95% (per EE for 950651)

Annual Uncontrolled PE = [4,125 lb-PM10/yr ÷ (1-0.95)]

Annual Uncontrolled PE = 82,500 lb-PM10/year

As shown above, the uncontrolled PE for PM10 emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to the requirements of 40 CFR 64 for PM10.

**Permit Unit C-705-11, '-12, and '-13 (Fertilizer Unloading)**

These units do not contain add on control devices for any pollutant; therefore, are not subject to CAM.

**Y. 40 CFR 60, Subpart G, Standards for Nitric Acid Plants**

This subpart has not been updated; however, a permit will be updated at this time per 40 CFR 60 for clarification purposes.

Current PTO '-3-3 condition 9 is as follows:

- Any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a)] Y

Draft PTO '3-4 contains an updated condition that allows startup, shutdown, and malfunction exceedences. The allowance is referenced from 40 CFR 60.11 (c), which reads "The opacity standards set forth in this part shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard." Condition 8 of draft PTO '3-4 reads as follows:

- Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Y

## **IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### **A. Requirements Addressed by Model General Permit Templates**

The applicant is not requesting to use any model general permit templates for this Title V renewal project.

### **B. Requirements not Addressed by Model General Permit Templates**

The applicant is not requesting any new permit shields within this Title V renewal project. In addition, existing obsolete permit shields have been removed from the draft permit for this renewal project.

## **X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.

## **XI. ATTACHMENTS**

- A. Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Authorities to Construct (ATC) to be Incorporated into Operating Permit
- D. Detailed Facility List
- E. Comparison of District Rules 4306 and 4305
- F. Comparison of SIP and non-SIP District Rule 4306
- G. Comments/Responses

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# ATTACHMENT A

Renewed Title V Operating Permit

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# Permit to Operate

**FACILITY:** C-705

**EXPIRATION DATE:** 11/30/2014

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

J R SIMPLOT COMPANY  
PO BOX 128  
HELM, CA 93627

**FACILITY LOCATION:**

12688 S COLORADO AVE  
HELM, CA 93627

**FACILITY DESCRIPTION:**

FERTILIZER PRODUCTION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Seyed Sadredin**  
Executive Director / APCO

**David Warner**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: C-705-0-2

EXPIRATION DATE: 11/30/2014

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rule 110 (Fresno)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rule 110 (Fresno)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0]
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020. [District Rules 2010 and 2020; and County Rule 201 (Fresno)] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) (Permits Required) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: J R SIMPLOT COMPANY  
Location: 12688 S COLORADO AVE, HELM, CA 93827  
C-705-0-2 : Mar 22 2011 7:47AM - CLEMENTB

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with District Rule 2520. [District Rules 2520, 9.5 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.8] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.9.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.9.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.9.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.9.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.10] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.14.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.14.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.14.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.14.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (amended 2/17/05), by using EPA method 9. If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall supply, sell, solicit or apply any architectural coating, except specialty coatings, that contains more than 250 grams of VOC per liter of coating (less water and exempt compounds, and excluding any colorant added to tint bases), or manufacture, blend, or repackage such coating with more than 250 grams of VOC per liter (less water and exempt compounds, and excluding any colorant added to tint bases) for use within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. No person shall apply, sell, solicit, or offer for sale any specialty architectural coating listed in the Table of Standards (District Rule 4601, Table 1 (12/17/09)), nor manufacture, blend, or repackage such coating for use within the District, which contains VOCs (less water and exempt compounds, excluding any colorant added to tint bases) in excess of the specified limits listed in Table 1 of Rule 4601 (12/17/09). [District Rule 4601, 5.2] Federally Enforceable Through Title V Permit
25. All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. A person shall not use VOCs for the cleanup of spray equipment unless equipment for collection of the cleaning compounds and minimizing its evaporation to the atmosphere is used. [District Rule 4601, 5.5] Federally Enforceable Through Title V Permit
27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.2 (12/17/09). [District Rule 4601, 6.1 and 6.2] Federally Enforceable Through Title V Permit
28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.14.1 and 10.0] Federally Enforceable Through Title V Permit
29. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
30. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
31. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
32. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
33. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
34. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
35. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8061 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rules 8071 and Rule 8011] Federally Enforceable Through Title V Permit
37. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
38. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.17] Federally Enforceable Through Title V Permit
39. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
40. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permit shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. This facility is subject to 40 CFR part 68. The facility shall submit a risk management plan (RMP) by June 21, 1999, or other dates specified in 40 CFR 68.10. The facility shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit
43. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin November 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due by the last day of the month following the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-1-6

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

71.4 MMBTU/HR UNION IRON WORKS, MODEL SPG-50-FS, NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND FLUE GAS RECIRCULATION (FGR)

## PERMIT UNIT REQUIREMENTS

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1. This boiler shall be fired exclusively on PUC quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. NOx emissions shall not exceed 30 ppmv @ 3% O2. [District NSR Rule] Federally Enforceable Through Title V Permit
3. CO emissions shall not exceed 200 ppmv @ 3% O2. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions shall not exceed any of the following limits: 0.0076 lb-PM10/MMBtu, 0.0006 lb-SOx/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The maximum heat input to the unit shall not exceed 9 billion Btu per calendar year. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
6. Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
8. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
9. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. [District Rule 4301] Federally Enforceable Through Title V Permit
10. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. To demonstrate compliance with this requirement, the unit shall be fired on PUC-regulated natural gas or on natural gas with sulfur content not exceeding 4.2% by weight. [District Rule 4801 and County Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
11. If the unit is fired on PUC-regulated natural gas, then the operator shall maintain copies of fuel invoices and supplier certification of fuel sulfur content. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
12. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

13. When determining sulfur emissions by fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails, weekly testing shall resume. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
14. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4351] Federally Enforceable Through Title V Permit
15. 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 4351] Federally Enforceable Through Title V Permit
16. The permittee shall monitor, at least on a monthly basis, the operational characteristics recommended by the unit manufacturer, e.g. the amount of water use, the amount of unit blow down, the exhaust stack temperature, or other characteristics recommended by the unit manufacturer. 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 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
19. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-2-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

469.0 HP CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY INTERNAL COMBUSTION ENGINE DRIVING A 313 KVA ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District NSR Rule] Federally Enforceable Through Title V Permit
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 5.7 and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702, 5.7] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District NSR Rule and District Rule 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702, 4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702, 5.7] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4702 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-3-4

**EXPIRATION DATE:** 11/30/2014

## **EQUIPMENT DESCRIPTION:**

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH<sub>3</sub> TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO<sub>3</sub> ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO<sub>2</sub> TO N<sub>2</sub> BUTANE FIRED COMBUSTOR FOR EMISSIONS, AND ONE 17,000 GALLON TANK FOR COLLECTION OF WEAK ACID

## **PERMIT UNIT REQUIREMENTS**

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. NO<sub>2</sub> emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District NSR Rule, District Rule 1080, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
3. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
4. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520, 9.4 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
5. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] Federally Enforceable Through Title V Permit
8. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
9. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO<sub>3</sub> produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
10. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
12. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080, 6.5] Federally Enforceable Through Title V Permit
13. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-4-5

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH 100 TON LIMESTONE STORAGE BIN SERVED BY FLEX KLEEN GJ-115 BAGHOUSE, SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

## PERMIT UNIT REQUIREMENTS

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1. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Emissions from limestone storage silo baghouse shall not exceed 0.02 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fan air pressure shall be maintained in the range of 9 to 10" w.c. to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. Permittee shall perform a complete inspection of the baghouse and its components on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
11. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-5-4

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.

## PERMIT UNIT REQUIREMENTS

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1. 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
2. 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 NSR Rule] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Primary scrubber sprays shall have a minimum water flow rate of 5 gallon per minute and a minimum recirculation flow rate of 200 gallon per minute during unit operation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Secondary scrubber sprays shall have a minimum product flow rate of 50 gallon per minute during unit operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Cooling tower water circulation rate shall not exceed 5,000 gallon per minute [District NSR Rule] Federally Enforceable Through Title V Permit
8. Production rate shall be limited to 600 tons per day or 120,000 tons per year of liquid fertilizer solution. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Emissions from the liquid ammonium phosphate fertilizer operation shall not exceed 0.001 lb-PM10 per ton of liquid fertilizer solution produced. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Daily records of liquid fertilizer solution produced shall be maintained in order to verify compliance with the production rate limit. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
12. Weekly records of the flow rates of scrubber liquids shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



13. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-6-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Daily records of liquid fertilizer solution production and hours of operation shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
5. Weekly records of the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-10-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

157 HP DETROIT DIESEL MODEL PDFP-L6YW-2506 DIESEL-FIRED INTERNAL COMBUSTION ENGINE DRIVING AN EMERGENCY FIRE WATER PUMP

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Engine shall be equipped with a turbocharger. [District NSR Rule] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rule 4801, County Rule 406 (Fresno), and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-11-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS

## PERMIT UNIT REQUIREMENTS

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1. Equipment for railcar unloading into storage building consists of a drag flight conveyor, bucket elevator, conveyor belt, conveyor belt brush, shuttle conveyor belt, and shuttle mover. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Equipment for truck loading from storage consists of a drag conveyor, bucket elevator, and telescoping chute. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Equipment for railcar to truck transfer consists of a screw conveyor, incline screw conveyor, and telescoping chute. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. A daily record of monoammonium and ammonium phosphate throughput shall be maintained, kept, and made available to the District upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
6. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
7. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-12-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

AMMONIUM SULFATE AND UREA DRY FERTILIZER STORAGE AND UNLOADING OPERATION INCLUDING FOUR BELT CONVEYORS, TWO BUCKET ELEVATORS, TWO SHUTTLE CONVEYORS, CONDITIONER, AND SEVEN BLOW PIPES.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput shall be recorded, maintained, and made available to the District upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-13-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput of urea shall be recorded, maintained, and made available to the District upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-14-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

1086 HP DETROIT DIESEL MODEL R163-7K35 (16 V-2000) DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800KW ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. 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
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
4. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District NSR Rule, District Rule 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. Emissions from this unit shall not exceed any of the following limits: NO<sub>x</sub> - 6.3 g/bhp-hr, SO<sub>x</sub> - 0.005 g/bhp-hr, CO - 0.22 g/bhp-hr and VOC - 0.016 g/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The PM<sub>10</sub> emissions rate shall not exceed 0.034 g/bhp-hr based on US EPA certification using ISO 8178 test procedure. [District NSR Rule] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 5.7 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702, 5.7] Federally Enforceable Through Title V Permit
10. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702, 4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702, 5.7] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
14. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4702 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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



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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-705-0-1

EXPIRATION DATE: 11/30/2004

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (7/21/94). [District Rule 2010, 3.0 and 4.0; 2020; and County Rule 201 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) (Permits Required) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: J R SIMPLOT COMPANY  
Location: 12688 S COLORADO AVE, HELM, CA 93627  
C-705-0-1, Aug 18 2009 10 47AM - CLEMENTB

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.6.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520(6/15/95) [District Rules 2520, 9.6.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.8] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.9.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.9.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.9.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.9.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.10] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.14.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.14.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.14.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.14.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (12/17/92), by using EPA method 9. If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall supply, sell, solicit or apply any architectural coating, except specialty coatings, that contains more than 250 grams of VOC per liter of coating (less water and exempt compounds, and excluding any colorant added to tint bases), or manufacture, blend, or repackage such coating with more than 250 grams of VOC per liter (less water and exempt compounds, and excluding any colorant added to tint bases) for use within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. No person shall apply, sell, solicit, or offer for sale any specialty architectural coating listed in the Table of Standards (District Rule 4601, Table 1 (12/17/92)), nor manufacture, blend, or repackage such coating for use within the District, which contains VOCs (less water and exempt compounds, excluding any colorant added to tint bases) in excess of the specified limits listed in Table 1 of Rule 4601 (12/17/92). [District Rule 4601, 5.2] Federally Enforceable Through Title V Permit
25. All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. A person shall not use VOCs for the cleanup of spray equipment unless equipment for collection of the cleaning compounds and minimizing its evaporation to the atmosphere is used. [District Rule 4601, 5.5] Federally Enforceable Through Title V Permit
27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.2 (12/17/92). [District Rule 4601, 6.1 and 6.2] Federally Enforceable Through Title V Permit
28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.14.1 and 10.0] Federally Enforceable Through Title V Permit
29. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
30. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
31. Disturbances of soil related to any construction, demolition, excavation, extraction, or water mining activities shall comply with the requirements for fugitive dust control in SJVUAPCD District Rule 8020 (4/25/96) unless specifically exempted under section 4 of Rule 8020 (4/25/96). [District Rule 8020] Federally Enforceable Through Title V Permit
32. Outdoor handling and storage of any bulk material which emits dust shall comply with the requirements of SJVUAPCD Rule 8030 (4/25/96), unless specifically exempted under section 4 of Rule 8030 (4/25/96). [District Rule 8030] Federally Enforceable Through Title V Permit
33. Any paved road over 3 miles in length, and any unpaved roads over half a mile in length, constructed after December 10, 1993 shall use the design criteria and dust control measures of, and comply with the administrative requirements of, SJVUAPCD Rule 8060 (4/25/96) unless specifically exempted under section 4 of Rule 8060 (4/25/96). [District Rule 8060] Federally Enforceable Through Title V Permit
34. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
35. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.17] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

36. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
37. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permit shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), Rules 201, 202, 203, 204, 208, and 209 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin), Rule 410.1 (Kern), and Rule 423 (Kern, Fresno, Stanislaus, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (12/17/92); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (12/17/92); 8020 (4/25/96); 8030 (4/25/96); 8060 (4/25/96); A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
41. This facility is subject to 40 CFR part 68. The facility shall submit a risk management plan (RMP) by June 21, 1999, or other dates specified in 40 CFR 68.10. The facility shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit
42. On October 6, 2000, the initial Title V permit was issued, the reporting period of the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of the end of reporting period. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-1-5

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

71.4 MMBTU/HR UNION IRON WORKS, MODEL SPG-50-FS, NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND FLUE GAS RECIRCULATION (FGR).

## PERMIT UNIT REQUIREMENTS

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1. This boiler shall be fired exclusively on PUC quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. NO<sub>x</sub> emissions shall not exceed 30 ppmv @ 3% O<sub>2</sub>. [District Rule 4305, 4351, and District NSR Rule] Federally Enforceable Through Title V Permit
3. CO emissions shall not exceed 200 ppmv @ 3% O<sub>2</sub>. [District Rule 4305 and District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions shall not exceed any of the following limits: 0.0076 lb-PM<sub>10</sub>/MMBtu, 0.0006 lb-SO<sub>x</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Natural gas annual heat input shall not exceed 9 billion Btu per calendar year. [District Rule 4351]
6. Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 43056 and 4351]
7. Source testing shall be conducted once every 12 months, and at least once every 36 months thereafter upon demonstrating compliance on 2 consecutive annual source testing. [District Rule 4305, District Rule 4351, and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
9. 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
10. Source testing to measure NO<sub>x</sub> emissions (ppmv) shall be conducted using EPA Method 7E or ARB Method 100. [District Rule 4305, 4351, and 1081] Federally Enforceable Through Title V Permit
11. Source testing to measure CO emissions (ppmv) shall be conducted using EPA Method 10 or ARB Method 100. [District Rule 4305, 4351, and 1081] Federally Enforceable Through Title V Permit
12. Source testing to measure stack gas oxygen concentration shall be conducted using EPA Method 3 or 3A, or CARB Method 100. [District Rule 4305, 4351, and 1081] Federally Enforceable Through Title V Permit
13. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The acceptable minimum flue gas recirculation rate shall be established by testing emissions from this unit or other representative units as approved by the district. The acceptable flue gas recirculation rate shall be the minimum flue gas recirculation rate with which compliance with applicable NO<sub>x</sub> and CO emissions limits have been demonstrated through source testing at a similar firing rate. [District Rule 4305 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. The flue gas recirculation rate shall be determined at least on a weekly basis by measuring the stack temperature (T<sub>s</sub>), windbox temperature (T<sub>w</sub>), and ambient temperature (T<sub>a</sub>) and using the following equation:  $FGR\ rate = \{(T_w - T_a) / (T_s - T_a)\} \times 100\%$ . [District Rule 4305 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the date and time of temperature measurements, the measured temperatures, and the calculated flue gas recirculation rate. The records shall also include a description of any corrective action taken to maintain the flue gas recirculation rate above the minimum acceptable rate. These records shall be retained at the facility and shall be made available for District inspection upon request. [District Rule 4305 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. If the flue gas recirculation rate is less than the acceptable level, the permittee shall notify the District and take corrective action within one (1) hour after detection. If the flue gas recirculation rate is not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits at the lower flue gas recirculation rate. [District Rule 4305 District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
19. Owner/operator shall record natural gas fuel use on a monthly basis. [District Rule 4305]
20. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr. [District Rule 4301, 5.2.2] Federally Enforceable Through Title V Permit
21. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. [District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
22. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. To demonstrate compliance with this requirement, the unit shall be fired on PUC-regulated natural gas or on natural gas with sulfur content not exceeding 4.2% by weight. [County Rule 406 and Rule 4801] Federally Enforceable Through Title V Permit
23. If the unit is fired on PUC-regulated natural gas, then the operator shall maintain copies of fuel invoices and supplier certification of fuel sulfur content. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
25. When determining sulfur emissions by fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NO<sub>x</sub> and CO. This mean shall be multiply by the appropriate factor. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306] Federally Enforceable Through Title V Permit
28. 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 Rule 4306] Federally Enforceable Through Title V Permit
29. The permittee shall monitor, at least on a monthly basis, the amount of water use, the amount of unit blow down, and the exhaust stack temperature or other operational characteristics recommended by the unit manufacturer. 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 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
30. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
31. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-2-1

EXPIRATION DATE: 11/30/2004

## EQUIPMENT DESCRIPTION:

469.0 HP CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY INTERNAL COMBUSTION ENGINE DRIVING A 313 KVA ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201; Rule 402 (Madera) and 404 (all 7 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
3. Unit shall be fired only on diesel fuel with a sulfur content of less than 0.05% by weight. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
4. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. If the IC engine is not fired on ARB regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, then the owner or operator shall determine the sulfur content of each delivery of diesel fuel being fired in the IC engine. The sulfur content shall be determined using ASTM method D 2880-71. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. Records of operating hours shall be kept for units operating less than 200 hours per year. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. On all units which are not emergency or backup IC engines operating less than 200 hours per year, operator shall perform a source test for particulate emissions within 6 months of the initial Title V permit issuance. A source test for particulate emissions conducted within the 24 months prior to permit issuance shall be considered compliance with this testing requirement. Source testing for particulate matter shall be performed according to EPA Method 5, stack gas velocity by EPA Method 2, and the stack gas moisture content by EPA Method 4. If the initial PM test result is less than or equal to 0.06 grain/dscf, then testing shall occur not less than once every 5 years. Otherwise testing shall occur not less than once every 24 months. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Test results from an engine that represents a group of engines in terms of rated brake horsepower, engine make and series, operational conditions, fuel used, and control method, shall satisfy testing requirements provided this group of engines is owned and operated by a single owner/operator. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. The operator of an internal combustion (IC) engine shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements of SJVUAPCD Rule 4201; Rule 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 402 (Madera) and 404 (Fresno, Merced, Kern, Kings, San Joaquin, Stanislaus, Tulare). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
12. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes, shall not exceed 200 hours per year. [District NSR Rule and District Rule 4701] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of hours of non-emergency operation and of the sulfur content of the diesel fuel used. Such records shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-3-3

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

50.3 MMBTU/HR NITRIC ACID PLANT, 200 TPD 100% HNO<sub>3</sub>, WITH STEAM TURBINE, AIR COMPRESSOR, TAIL GAS EXPANDER, AMMONIA VAPORIZER AND SUPERHEATER, CONVERTER (NH<sub>3</sub> TO NO) AND TAIL GAS HEATER, ABSORBER (NO TO HNO<sub>3</sub>), AND COMBUSTOR (NO<sub>2</sub> TO N<sub>2</sub>) FOR EMISSIONS.

## PERMIT UNIT REQUIREMENTS

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1. Nitric acid plant consists of: One 6.87 MMBtu/hr natural gas fired catalyst preheater and one 17,000 gallon tank for collection of weak nitric acid, to be used during plant start-up. [District NSR Rule] Federally Enforceable Through Title V Permit
2. 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 NSR Rule] Federally Enforceable Through Title V Permit
3. NO<sub>2</sub> emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District NSR Rule, District Rule 1080, 40 CFR 60.72(a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
4. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
5. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520, 9.4.2 and 40 CFR 60.73(c)] Federally Enforceable Through Title V Permit
6. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Fresno County Rule 406 and District Rule 4801] Federally Enforceable Through Title V Permit
9. Any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a)] Federally Enforceable Through Title V Permit
10. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO<sub>3</sub> produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
11. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 8 hours after the breakdown is detected. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
13. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080, 6.5] Federally Enforceable Through Title V Permit
14. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-4-3

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH 100 TON LIMESTONE STORAGE BIN SERVED BY FLEX KLEEN GJ-115 BAGHOUSE, SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS.

## PERMIT UNIT REQUIREMENTS

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1. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Emissions from limestone storage silo baghouse shall not exceed 0.02 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fan air pressure shall be maintained in the range of 9 to 10" w.c. to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. Permittee shall perform a complete inspection of the baghouse and its components on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-5-6

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

LIQUID AMMONIUM PHOSPHATE UNIT INCLUDING REACTOR VESSEL WITH SCRUBBER, SECONDARY SCRUBBER, HEAT EXCHANGERS, STORAGE TANKS, ASSOCIATED PUMPS AND PERMIT EXEMPT COOLING TOWER (LESS THAN 10,000 GALLONS PER MINUTE)

## PERMIT UNIT REQUIREMENTS

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1. 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
2. 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 NSR Rule] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Primary scrubber sprays shall have a minimum water flow rate of 5 gallon per minute and a minimum recirculation flow rate of 200 gallon per minute during unit operation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Secondary scrubber sprays shall have a minimum product flow rate of 50 gallon per minute during unit operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Cooling tower water circulation rate shall not exceed 5,000 gallon per minute [District NSR Rule] Federally Enforceable Through Title V Permit
8. Production rate shall be limited to 600 tons per day of liquid fertilizer solution. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Emissions from the liquid ammonium phosphate fertilizer operation shall not exceed 0.0368 lb-PM10 per ton of liquid fertilizer solution produced. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Daily records of liquid fertilizer solution produced shall be maintained in order to verify compliance with the production rate limit. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
12. Weekly records of the flow rates of scrubber liquids shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-6-1

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER.

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Daily records of liquid fertilizer solution production and hours of operation shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. Weekly records of the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-10-1

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

157 HP DETROIT DIESEL, MODEL PDFP-L6YW-2506 DIESEL-FIRED INTERNAL COMBUSTION ENGINE DRIVING AN EMERGENCY FIRE WATER PUMP.

## PERMIT UNIT REQUIREMENTS

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1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201; Rule 402 (Madera) and 404 (all 7 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
3. Unit shall be fired only on diesel fuel with a sulfur content of less than 0.05% by weight. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
4. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. If the IC engine is not fired on ARB regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, then the owner or operator shall determine the sulfur content of each delivery of diesel fuel being fired in the IC engine. The sulfur content shall be determined using ASTM method D 2880-71. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. Records of operating hours shall be kept for units operating less than 200 hours per year. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. On all units which are not emergency or backup IC engines operating less than 200 hours per year, operator shall perform a source test for particulate emissions within 6 months of the initial Title V permit issuance. A source test for particulate emissions conducted within the 24 months prior to permit issuance shall be considered compliance with this testing requirement. Source testing for particulate matter shall be performed according to EPA Method 5, stack gas velocity by EPA Method 2, and the stack gas moisture content by EPA Method 4. If the initial PM test result is less than or equal to 0.06 grain/dscf, then testing shall occur not less than once every 5 years. Otherwise testing shall occur not less than once every 24 months. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Test results from an engine that represents a group of engines in terms of rated brake horsepower, engine make and series, operational conditions, fuel used, and control method, shall satisfy testing requirements provided this group of engines is owned and operated by a single owner/operator. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. The operator of an internal combustion (IC) engine shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements of SJVUAPCD Rule 4201; Rule 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 402 (Madera) and 404 (Fresno, Merced, Kern, Kings, San Joaquin, Stanislaus, Tulare). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
12. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Engine shall be equipped with a turbocharger. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes, shall not exceed 200 hours per year. [District NSR Rule and District Rule 4701] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of hours of non-emergency operation and of the sulfur content of the diesel fuel used. Such records shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-11-1

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS.

## PERMIT UNIT REQUIREMENTS

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1. Equipment for railcar unloading into storage building consists of a drag flight conveyor, bucket elevator, conveyor belt, conveyor belt brush, shuttle conveyor belt, and shuttle mover. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Equipment for truck loading from storage consists of a drag conveyor, bucket elevator, and telescoping chute. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Equipment for railcar to truck transfer consists of a screw conveyor, incline screw conveyor, and telescoping chute. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. A daily record of monoammonium and ammonium phosphate throughput shall be maintained, kept, and made available to the District upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-12-1

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

AMMONIUM SULFATE AND UREA DRY FERTILIZER STORAGE AND UNLOADING OPERATION INCLUDING FOUR BELT CONVEYORS, TWO BUCKET ELEVATORS, TWO SHUTTLE CONVEYORS, CONDITIONER, AND SEVEN BLOW PIPES.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput shall be recorded, maintained, and made available to the District upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-13-1

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER.

## **PERMIT UNIT REQUIREMENTS**

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1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput of urea shall be recorded, maintained, and made available to the District upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-14-1

**EXPIRATION DATE:** 11/30/2004

**EQUIPMENT DESCRIPTION:**

1086 HP DETROIT DIESEL MODEL R163-7K35 (16 V-2000) DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800KW ELECTRICAL GENERATOR.

## PERMIT UNIT REQUIREMENTS

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1. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per year. [District NSR Rule, District Rule 4701, and CCR 93115] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. 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
7. The sulfur content of the diesel fuel used shall not exceed 0.0015% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Emissions from this unit shall not exceed any of the following limits: NO<sub>x</sub>; 6.3 g/hp-hr, SO<sub>x</sub>; 0.005 g/hp-hr, CO; 0.22 g/hp-hr and VOC; 0.016 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The PM<sub>10</sub> emissions rate shall not exceed 0.034 g/hp-hr based on US EPA certification using ISO 8178 test procedure. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the number of hours of operation, the purpose of the operation (e.g., load testing, weekly testing, rolling blackout, general area power outage, etc.), and the sulfur content of the diesel fuel used. Such records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT C

ATCs to be Incorporated into Operating Permit





# AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-705-3-5

**ISSUANCE DATE:** 02/11/2009

**LEGAL OWNER OR OPERATOR:** J R SIMPLOT COMPANY

**MAILING ADDRESS:** PO BOX 128  
 HELM, CA 93627

**LOCATION:** 12688 S COLORADO AVE  
 HELM, CA 93627

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 50.3 MMBTU/HR NITRIC ACID PLANT, 200 TPD 100% HNO3, WITH STEAM TURBINE, AIR COMPRESSOR, TAIL GAS EXPANDER, AMMONIA VAPORIZER AND SUPERHEATER, CONVERTER (NH3 TO NO) AND TAIL GAS HEATER, ABSORBER (NO TO HNO3), AND COMBUSTOR (NO2 TO N2) FOR EMISSIONS: REMOVE REFERENCE OF 200 TPD 100% HNO3 FROM EQUIPMENT DESCRIPTION AND MOVE (FROM PERMIT CONDITION #1) ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER AND ONE 17,000 GALLON TANK FOR COLLECTION OF WEAK NITRIC ACID TO THE EQUIPMENT DESCRIPTION

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. 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 NSR Rule] Federally Enforceable Through Title V Permit
3. NO2 emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District NSR Rule, District Rule 1080, 40 CFR 60.72(a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
4. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
5. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520, 9.4.2 and 40 CFR 60.73(c)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Sadreddin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

C:705-3-5 - Aug 18 2009 10 51AM - CLEMENTB - Joint Inspection NOT Required

6. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Fresno County Rule 406 and District Rule 4801] Federally Enforceable Through Title V Permit
9. Any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a)] Federally Enforceable Through Title V Permit
10. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO<sub>3</sub> produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
11. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
12. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
13. The continuous NO<sub>x</sub> monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080, 6.5] Federally Enforceable Through Title V Permit
14. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-705-5-7

**ISSUANCE DATE:** 11/19/2008

**LEGAL OWNER OR OPERATOR:** J R SIMPLOT COMPANY

**MAILING ADDRESS:** PO BOX 128  
HELM, CA 93627

**LOCATION:** 12688 S COLORADO AVE  
HELM, CA 93627

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF LIQUID AMMONIUM PHOSPHATE UNIT INCLUDING REACTOR VESSEL WITH SCRUBBER, SECONDARY SCRUBBER, HEAT EXCHANGERS, STORAGE TANKS, ASSOCIATED PUMPS AND PERMIT EXEMPT COOLING TOWER (LESS THAN 10,000 GALLONS PER MINUTE): LOWER PM10 EMISSION LIMIT FROM 0.0366 LB-PM10/TON TO 0.001 LB-PM10/TON AND LOWER ANNUAL AMMONIUM PHOSPHATE PRODUCTION LIMIT FROM 219,000 TON/YEAR TO 120,000 TON/YEAR

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) C-705-5-5 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
3. 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 NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-705-5-7 Aug 18 2009 10:51AM -- CLEMENTE Joint Inspection NOT Required

8. Primary scrubber sprays shall have a minimum water flow rate of 5 gallon per minute and a minimum recirculation flow rate of 200 gallon per minute during unit operation. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Secondary scrubber sprays shall have a minimum product flow rate of 50 gallon per minute during unit operation. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Cooling tower water circulation rate shall not exceed 5,000 gallon per minute [District NSR Rule] Federally Enforceable Through Title V Permit
11. Production rate shall be limited to 600 tons per day or 120,000 tons per year of liquid fertilizer solution. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Emissions from the liquid ammonium phosphate fertilizer operation shall not exceed 0.001 lb-PM10 per ton of liquid fertilizer solution produced. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Daily records of liquid fertilizer solution produced shall be maintained in order to verify compliance with the production rate limit. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
15. Weekly records of the flow rates of scrubber liquids shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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# ATTACHMENT D

Detailed Facility List

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**Detailed Facility Report**  
For Facility=705 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

<b>J R SIMPLOT COMPANY</b> 12688 S COLORADO AVE HELM, CA 93627	FAC # STATUS: TELEPHONE:	<b>C 705</b> <b>A</b> <b>5598665681</b>	TYPE: TOXIC ID:	<b>TitleV</b> <b>40139</b>	EXPIRE ON: AREA: INSP. DATE:	<b>11/30/2004</b> <b>9 / 314</b> <b>04/11</b>
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-705-1-6	71.4 MMBTU/HR U.I.W. BOILER	3020-02 H	1	1,030.00	1,030.00	A	71.4 MMBTU/HR UNION IRON WORKS, MODEL SPG-50-FS, NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND FLUE GAS RECIRCULATION (FGR)
C-705-2-2	469.0 HP I.C. ENGINE	3020-10 D	1	479.00	479.00	A	469.0 HP CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY INTERNAL COMBUSTION ENGINE DRIVING A 313 KVA ELECTRICAL GENERATOR
C-705-3-4	50.3 MMBTU/HR NITRIC ACID PLNT	3020-02 H	1	1,030.00	1,030.00	A	NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH3 TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE FIRED COMBUSTOR FOR EMISSIONS, AND ONE 17,000 GALLON TANK FOR COLLECTION OF WEAK ACID
C-705-4-5	1230.0 HP #3 PHOS ACID PLANT	3020-01 G	1	815.00	815.00	A	CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH 100 TON LIMESTONE STORAGE BIN SERVED BY FLEX KLEEN GJ-115 BAGHOUSE, SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS
C-705-5-4	167.5 hp	3020-01 D	1	314.00	314.00	A	LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.
C-705-6-2	190.0 HP AMMO-NITRATE PLANT	3020-01 D	1	314.00	314.00	A	190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER
C-705-10-2	157 HP DIESEL-FIRED IC ENGINE	3020-10 B	1	117.00	117.00	A	157 HP DETROIT DIESEL MODEL PDFP-L6YW-2506 DIESEL-FIRED INTERNAL COMBUSTION ENGINE DRIVING AN EMERGENCY FIRE WATER PUMP
C-705-11-2	121.0 HP UNLOADING OPERATION	3020-01 D	1	314.00	314.00	A	MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS
C-705-12-2	122.5 HP UNLOADING OPERATION	3020-01 D	1	314.00	314.00	A	AMMONIUM SULFATE AND UREA DRY FERTILIZER STORAGE AND UNLOADING OPERATION INCLUDING FOUR BELT CONVEYORS, TWO BUCKET ELEVATORS, TWO SHUTTLE CONVEYORS, CONDITIONER, AND SEVEN BLOW PIPES.
C-705-13-2	72.5 HP UNLOADING SHED	3020-01 C	1	197.00	197.00	A	72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER
C-705-14-2	1086 hp Detroit Diesel engine	3020-10 F	1	749.00	749.00	A	1086 HP DETROIT DIESEL MODEL R163-7K35 (16 V-2000) DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800KW ELECTRICAL GENERATOR

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# ATTACHMENT E

Comparison of Rules 4306 and 4305

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**Side-by-side Comparison of Applicable Requirements for JR Simplot Boiler C-705-1:**

<b>CATEGORY</b>	<b>District Rule 4305 (8/21/03 Version)</b>	<b>District Rule 4306 (10/16/08 Version)</b>
<b>EMISSION LIMITS:</b>	For units less than 30 billion Btu/yr, perform/meet one of the following: 1) Tune once per year, 2) Exhaust O <sub>2</sub> at 3% or less by volume, or 3) 30 ppmvd-NO <sub>x</sub> and 400 ppmvd-CO	For units less than 9 billion Btu/yr, perform/meet one of the following: 1) Tune once per year, 2) Exhaust O <sub>2</sub> at 3% or less by volume, or 3) 9 ppmvd-NO <sub>x</sub> and 400 ppmvd-CO
<b>MONITORING:</b>	1) Monitor operational characteristics 2) Fuel flow meter	1) Monitor operational characteristics 2) Fuel flow meter
<b>RECORDKEEPING:</b>	1) Maintain records for 5 years 2) Maintain records of annual heat input 3) Maintain records of tune-ups and monitoring operational characteristics	1) Maintain records for 5 years 2) Maintain records of annual heat input 3) Maintain records of tune-ups and monitoring operational characteristics
<b>REPORTING:</b>	None	None
<b>SOURCE TESTING:</b>	None	None
<b>TEST METHODS:</b>	None	None



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# ATTACHMENT F

Comparison of SIP and Non-SIP Rule 4306

**Comparison of the latest amended version (amended October 16, 2008) of District Rule 4306 and the current SIP approved version, adopted September 18, 2003**

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<b>APPLICABILITY</b>		
This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a total rated heat input greater than 5 million Btu per hour.	X	X
<b>EXEMPTIONS</b>		
<p>The requirements of this rule shall not apply to:</p> <p>Solid fuel fired units.</p> <p>Dryers and glass melting furnaces.</p> <p>Kilns and smelters where the products of combustion come into direct contact with the material to be heated.</p> <p>Unfired or fired waste heat recovery boilers that are used to recover or augment heat from the exhaust of combustion turbines or internal combustion engines.</p> <p>The requirements of Sections 5.1.1 and 5.1.2 shall not apply to a unit when burning any fuel other than PUC quality natural gas during PUC quality natural gas curtailment provided all of the following conditions are met:</p> <ul style="list-style-type: none"> <li>• Fuels other than PUC quality natural gas are burned no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing, as limited by Permit to Operate.</li> <li>• NOx emission shall not exceed 150 ppmv or 0.215 lb/MMBtu. Demonstration of compliance with this limit shall be made by either source testing, continuous emission monitoring system (CEMS), an APCO approved Alternate Monitoring System, or an APCO approved portable NOx analyzer.</li> </ul>	X	X
<b>REQUIREMENTS</b>		
<p><u>NOx and CO Limits (Standard Option)</u></p> <p>Units with a rated heat input equal to or less than 20.0 MMBtu/hour, except for Categories C, D, E, F, G, H, and I units</p> <p>Gaseous Fuel: 15 ppmv or 0.018 lb-NOx/MMBtu; 400 ppmv-CO</p> <p>Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO</p>	X	X

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<u>NOx and CO Limits (Standard Option)</u> Units with a rated heat input greater than 20.0 MMBtu/hour, except for Categories C, D, E, F, G, H, and I units Gaseous Fuel: 9 ppmv or 0.011 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO	X	X
<u>NOx and CO Limits (Standard Option)</u> Oilfield Steam Generators Gaseous Fuel: 15 ppmv or 0.018 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO	X	X
<u>NOx and CO Limits (Standard Option)</u> Refinery units with a rated heat input greater than 5 MMBtu/hr up to 65 MMBtu/hr Gaseous Fuel: 30 ppmv or 0.036 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO	X	X
<u>NOx and CO Limits (Standard Option)</u> Refinery units with a rated heat input greater than 65 MMBtu/hr up to 110 MMBtu/hr Gaseous Fuel: 25 ppmv or 0.031 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO	X	X
<u>NOx and CO Limits (Standard Option)</u> Refinery units with a rated heat input greater than 110 MMBtu/hr Gaseous Fuel: 5 ppmv or 0.0062 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO	X	X
<u>NOx and CO Limits (Standard Option)</u> Load-following units Gaseous Fuel: 15 ppmv or 0.018 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO	X	X

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<u>NOx and CO Limits (Standard Option)</u> Units limited by a Permit to Operate to an annual heat input of 9 billion Btu/year to 30 billion Btu/year Gaseous Fuel: 30 ppmv or 0.036 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO	X	X
<u>NOx and CO Limits (Standard Option)</u> Units in which the rated heat input of each burner is less than or equal to 5 MMBtu/hr but the total rated heat input of all the burners in a unit is greater than 5 MMBtu/hr, as specified in the Permit to Operate, and in which the products of combustion do not come in contact with the products of combustion of any other burner. Gaseous Fuel: 30 ppmv or 0.036 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO	X	X
<u>NOx and CO Limits (Enhanced Option)</u> Units with a rated heat input equal to or less than 20.0 MMBtu/hour, except for Categories C, D, E, F, G, H, and I units Gaseous Fuel: 9 ppmv or 0.011 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO		X
<u>NOx and CO Limits (Enhanced Option)</u> Units with a rated heat input greater than 20.0 MMBtu/hour, except for Categories C, D, E, F, G, H, and I units Gaseous Fuel: 6 ppmv or 0.007 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO		X
<u>NOx and CO Limits (Enhanced Option)</u> Load-following units Gaseous Fuel: 9 ppmv or 0.011 lb-NOx/MMBtu; 400 ppmv-CO Liquid Fuel: 400 ppmv or 0.052 lb-NOx/MMBtu; 400 ppmv-CO		X

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<p>When a unit is operated on combinations of gaseous fuel and liquid fuel, the NOx limit shall be the heat input weighted average of the applicable limits specified in Sections 5.1.1, as calculated by the following equation:</p> $\text{WeightedAverageLimit} = \frac{(\text{NOx limit for gaseous fuel} \times G) + (\text{NOx limit for liquid fuel} \times L)}{G + L}$ <p>Where: G = annual heat input from gaseous fuel L = annual heat input from liquid fuel</p>	X	X
<p>For each unit that is limited to less than 9 billion Btu per calendar year heat input pursuant to a Permit to Operate, the operator shall comply with the requirement of Section 7.4 and one of the following:</p> <ul style="list-style-type: none"> <li>• tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). 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; or</li> <li>• operate the unit in a manner that maintains exhaust oxygen concentrations at less than or equal to 3.00 percent by volume on a dry basis; or</li> <li>• operate the unit in compliance with the applicable emission limits of Sections 5.1.1 or 5.1.2.</li> </ul>	X	X

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<p>The applicable emission limits of Sections 5.1, 5.2.2 and 5.2.3 shall not apply during start-up or shutdown provided an operator complies with the requirements specified below.</p> <ul style="list-style-type: none"> <li>• The duration of each start-up or each shutdown shall not exceed two hours, except as provided in Section 5.3.3.</li> <li>• The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown.</li> <li>• An operator may submit an application for a Permit to Operate condition to allow more than two hours for each start-up or each shutdown provided the operator meets all of the following conditions: <ul style="list-style-type: none"> <li>a. The maximum allowable duration of start-up or shutdown will be determined by the APCO. The allowable duration of start-up shall not exceed twelve hours and the allowable duration of shutdown shall not exceed nine hours.</li> <li>b. The APCO will only approve start-up or shutdown duration longer than two hours when the application clearly identifies the control technologies or strategies to be utilized; and describes what physical conditions prevail during start-up or shutdown periods that prevent the controls from being effective; and provides a reasonably precise estimate as to when the physical conditions will have reached a state that allows for the effective control of emissions.</li> </ul> </li> <li>• The operator shall submit to the APCO any information deemed necessary by the APCO to determine the appropriate length of start-up or shutdown. The information shall include a detailed list of activities to be performed during start-up or shutdown and a reasonable explanation for the length of time needed to complete each activity; and a description of the material process flow rates and system operating parameters, etc., the operator plans to evaluate during the process optimization; and an explanation of how the activities and process flow affect the operation of the emissions control equipment; and basis for the requested additional duration of start-up or shutdown.</li> </ul>	X	X
<ul style="list-style-type: none"> <li>▪ Permit to Operate modification solely to include start-up or shutdown conditions shall be exempt from the BACT and offset requirements of Rule 2201 (New and Modified Stationary Source Review Rule) for applications for Authority to Construct that are submitted and are approved by the APCO by the applicable "full compliance" schedule specified in Section 7.1 Table 2</li> </ul>	X	

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<ul style="list-style-type: none"> <li>▪ Permit to Operate (PTO) modifications solely to include start-up or shutdown conditions may be exempt from Best Available Control Technology (BACT) and emission offset requirements if the PTO modifications meet the requirements of Rule 2201 (New or Modified Stationary Source Review Rule) Section 4.2 (BACT Exemptions) and Rule 2201 Section 4.6 (Offset Exemptions).</li> </ul>		X
<b>MONITORING PROVISIONS</b>		
<p>The operator of any unit which simultaneously fires gaseous and liquid fuels shall install and maintain an operational non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit. Volumetric flow measurements shall be periodically compensated for temperature and pressure.</p>	X	X
<p>The operator of any unit subject to the applicable emission limits in Sections 5.1 shall install and maintain an operational APCO approved Continuous Emissions Monitoring System (CEMS) for NO<sub>x</sub>, CO, and oxygen, or implement an APCO-approved Alternate Monitoring System. An APCO approved CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13 (except subsection h), 40 CFR Part 60 Appendix B (Performance Specifications) and 40 CFR Part 60 Appendix F (Quality Assurance Procedures, and applicable provisions of Rule 1080 (Stack Monitoring). An APCO approved Alternate Monitoring System shall monitor one or more of the following: periodic NO<sub>x</sub> and CO exhaust emission concentrations, periodic exhaust oxygen concentration, flow rate of reducing agent added to exhaust, catalyst inlet and exhaust temperature, catalyst inlet and exhaust oxygen concentration, periodic flue gas recirculation rate, other operational characteristics.</p>	X	X
<p>For units subject to the requirements of Section 5.2.1 or 5.2.2, the operator shall monitor, at least on a monthly basis, the operational characteristics recommended by the manufacturer and approved by the APCO.</p>	X	X
<p>The operator of any Category H unit listed in Section 5.1.1 Table 1 and any unit subject to Section 5.2.1 or 5.2.2 shall install and maintain an operational non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit. Volumetric flow measurements shall be periodically compensated for temperature and pressure. A master meter, which measures fuel to all units in a group of similar units, may satisfy these requirements if approved by the APCO in writing. The cumulative annual fuel usage may be verified from utility service meters, purchase or tank fill records, or other acceptable methods, as approved by the APCO.</p>	X	X

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<p>The APCO shall not approve an alternative monitoring system unless it is documented that continued operation within ranges of specified emissions-related performance indicators or operational characteristics provides a reasonable assurance of compliance with applicable emission limits. The operator shall source test over the proposed range of surrogate operating parameters to demonstrate compliance with the applicable emission standards.</p>		X
<b>COMPLIANCE DETERMINATION</b>		
<p>The operator of any unit shall have the option of complying with either the applicable heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling).</p>	X	X
<p>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.</p>	X	
<p>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. Unless otherwise 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.</p>		X
<p>All Continuous Emissions Monitoring System (CEMS) emissions measurements shall be averaged over a period of 15 consecutive minutes to demonstrate compliance with the applicable emission limits of this rule. Any 15-consecutive-minute block average CEMS measurement exceeding the applicable emission limits of this rule shall constitute a violation of this rule.</p>	X	X
<p>For emissions monitoring pursuant to Sections 5.4.2, 5.4.2.1, and 6.3.1 using a portable NOx analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings 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 (5) readings evenly spaced out over the 15-consecutive-minute period.</p>	X	X



<b>District Rule 4306 Requirements</b>	<b>Adopted September 18, 2003</b>	<b>Amended October 16, 2008</b>
For emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit.	X	X
<b>RECORDKEEPING</b>		
The records required by Sections 6.1.1 through 6.1.4 shall be maintained for five calendar years and shall be made available to the APCO upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.	X	X
The operator of any unit operated under the exemption of Section 4.2 shall monitor and record for each unit the cumulative annual hours of operation on each fuel other than natural gas during periods of natural gas curtailment and equipment testing. The NOx emission concentration (in ppmv or lb/MMBtu) for each unit that is operated during periods of natural gas curtailment shall be recorded. Failure to maintain records required by Section 6.1.1 or information contained in the records that demonstrates noncompliance with the conditions for exemption under Section 4.2 will result in loss of exemption status. On and after the applicable compliance schedule specified in Section 7.0, any unit losing an exemption status shall be brought into full compliance with this rule as specified in Section 7.3.	X	X
The operator of any Category H unit listed in Section 5.1.1 Table 1 and any unit that is subject to the requirements of Section 5.2 shall record the amount of fuel use at least on a monthly basis for each unit, or for a group of units as specified in Section 5.4.4. On and after the applicable compliance schedule specified in Section 7.0, in the event that such unit exceeds the applicable annual heat input limit specified in Sections 5.1.1 Table 1 Category H and Section 5.2, the unit shall be brought into full compliance with this rule as specified in Section 7.4.	X	X
The operator of any unit subject to Section 5.2.1 or Section 6.3.1 shall maintain records to verify that the required tune-up and the required monitoring of the operational characteristics of the unit have been performed.	X	X
The operator performing start-up or shutdown of a unit shall keep records of the duration of start-up or shutdown.	X	X
<b>TEST METHODS</b>		

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<p>The following test methods shall be used unless otherwise approved by the APCO and EPA.</p> <p>Fuel hhv shall be certified by third party fuel supplier or determined by: ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels; ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels.</p> <p>Oxides of nitrogen (ppmv) - EPA Method 7E, or ARB Method 100.</p> <p>Carbon monoxide (ppmv) - EPA Method 10, or ARB Method 100.</p> <p>Stack gas oxygen - EPA Method 3 or 3A, or ARB Method 100.</p> <p>NOx Emission Rate (Heat Input Basis) - EPA Method 19.</p> <p>Stack gas velocities - EPA Method 2.</p> <p>Stack gas moisture content - EPA Method 4.</p>	X	X
<b>COMPLIANCE TESTING</b>		
<p>Each unit subject to the requirements in Sections 5.1 or 5.2.3 shall be source tested to determine compliance with the applicable emission limits at least once every 12 months, (no more than 30 days before or after the required annual source test date). Units that demonstrate compliance on two consecutive 12-month source tests may defer the following 12-month source test for up to 36 months (no more than 30 days before or after the required 36-month source test date). During the 36-month source testing interval, the operator shall tune the unit in accordance with the provisions of Section 5.2.1, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer to ensure compliance with the applicable emission limits specified in Sections 5.1 or 5.2.3. Tune-ups required by Sections 5.2.1 and 6.3.1 do not need to be performed for units that operate and maintain an APCO approved CEMS or an APCO approved Alternate Monitoring System where the applicable emission limits are periodically monitored. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits specified in Sections 5.1 or 5.2.3, the source testing frequency shall revert to at least once every 12 months. Failure to comply with the requirements Section 6.3.1, or any source test results that exceed the applicable emission limits in Sections 5.1 or 5.2.3 shall constitute a violation of this rule.</p>	X	X

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<p>In lieu of compliance with Section 6.3.1, compliance with the applicable emission limits in Sections 5.1 or 5.2.3 shall be demonstrated by submittal of annual emissions test results to the District from a unit or units that represents a group of units, provided All units in the group are initially source tested. The emissions from all test runs from units within the group are less than 90% of the permitted value, and the emissions do not vary greater than 25% from the average of all test runs; and all units in a group are similar in terms of rated heat input, make and series, operational conditions, fuel used, and control method. No unit with a rated heat input greater than 100 MMBtu shall be considered as part of the group; and the group is owned by a single owner and is located at a single stationary source; and selection of the representative unit(s) is approved by the APCO prior to testing; and the number of representative units source tested shall be at least 30% of the total number of units in the group. The representative tests shall rotate each year so that within three years all units in the group have been tested at least once. All units in the group shall have received the similar maintenance and tune-up procedures as the representative unit(s) as listed in the Permit to Operate. The operator shall submit to the APCO the specific maintenance procedures to be performed on each unit that will be included in the group for representative testing. Such maintenance procedures shall be specified in the Permit to Operate for units that are included in the group for representative testing. Any maintenance work on a unit which has no effect on emissions standards and which is not specified in the maintenance procedures shall be submitted to the APCO for approval before such unit can be included as part of the group for representative testing. Any unit that necessitates any maintenance work which has an effect on emission standards and is beyond the maintenance procedures identified in the Permit to Operate, shall not be included as part of the group for representative testing. The unit shall be source tested in accordance with the provisions of Section 6.3.1; and should any of the representative units exceed the required emission limits, each of the units in the group shall demonstrate compliance by emissions testing. Failure to complete emissions testing within 90 days of the failed test shall result in the untested units being in violation of this rule. After compliance with the requirements of Section 6.3.2.7 has been demonstrated, subsequent source testing shall be performed pursuant to Sections 6.3.1 or 6.3.2.</p>	X	X
<b>EMISSION CONTROL PLAN</b>		

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<p>The operator of any unit shall submit to the APCO for approval an Emissions Control Plan according to the compliance schedule in Section 7.0. For each unit, the plan shall contain the following: Permit to Operate number, fuel type and hhv, annual fuel consumption (Btu/yr), current emission level, including method used to determine emission level, and plan of actions, including a schedule of increments of progress, which will be taken to satisfy the requirements of Section 5.0 and the compliance schedule in Section 7.0.</p>	X	
<p>The operator of any unit shall submit to the APCO for approval an Emissions Control Plan according to the compliance schedule in Section 7.0. For each unit, the plan shall contain the following: Permit to Operate number, fuel type and hhv, annual fuel consumption (Btu/yr), current emission level, including method used to determine emission level, NOx limit to be satisfied, either Standard Option or Enhanced Option, and plan of actions, including a schedule of increments of progress, which will be taken to satisfy the requirements of Section 5.0 and the compliance schedule in Section 7.0.</p>		X
<p>The operator shall submit to the APCO for approval, as part of the ECP, a list of units which are to be designated as load-following units. The APCO shall only designate, as load-following, units for which the following information has been provided to demonstrate that the units qualify as load-following: technical data such as steam demand charts or other information to demonstrate the normal operational load fluctuations and requirements of the unit, technical data about the operational response range of an ultra low NOx burner system(s) operating at 9 ppmv NOx, and technical data demonstrating that the unit(s) are designed and operated to optimize the use of base-loaded units in conjunction with the load-following unit(s).</p>	X	X
<b>CALCULATIONS</b>		
<p>All ppmv emission limits specified in Section 5.1 are referenced at dry stack gas conditions and 3.00 percent by volume stack gas oxygen. Emission concentrations shall be corrected to 3.00 percent oxygen as follows:</p> $[\text{ppm NOx}]_{\text{corrected}} = \frac{17.95\%}{20.95\% - [\%O2]_{\text{measured}}} \times [\text{ppm NOx}]_{\text{measured}}$ $[\text{ppm CO}]_{\text{corrected}} = \frac{17.95\%}{20.95\% - [\%O2]_{\text{measured}}} \times [\text{ppm CO}]_{\text{measured}}$ <p>All pounds per million Btu NOx emission rates shall be calculated as pounds of nitrogen dioxide per million Btu of heat input (hhv).</p>	X	X
<b>ALTERNATIVE EMISSION CONTROL</b>		

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<p>The single owner of two or more units may comply with Section 5.1 by controlling units in operation at the same stationary source, or at two contiguous stationary sources, to achieve an aggregated NOx emission factor no higher than 90 percent of the aggregated NOx emission factor limit that would result if each unit in operation were individually in compliance with the applicable NOx emission limits in Section 5.1. An operator that is subject to the AECR requirements below shall also comply with the applicable requirements of Sections 5.0, 6.0, 7.0 and 8.0.</p>	X	X
<p>A unit not subject to Section 5.1 or Section 5.2.3 is not eligible for inclusion in an AECR.</p>	X	X
<p>No unit subject to Sections 5.2.1 or 5.2.2 shall be included in an AECR.</p>	X	X
<p>Aggregated NOx emission factor limit: the sum of the NOx emissions, over seven consecutive calendar days, that would result if all units in the AECR were in compliance with the lb/MMBtu limits in Section 5.1 and operating at their actual firing rates, divided by the sum of the heat input of all units in the AECR over seven consecutive calendar days. Aggregated emission factor limit is calculated as:</p> $L_A = \frac{\sum L_i F_i}{\sum F_i}$ <p>where: <math>L_A</math> is the aggregated NOx emission factor limit (lb/MMBtu)</p> <p><math>L_i</math> is the applicable NOx emission factor limit (lb/MMBtu) specified in Section 5.1.1 Table 1 or Section 5.1.2 for each category of unit in the AECR,</p> <p><math>F_i</math> is the total heat input (hmv basis) of fuel (MMBtu) combusted in each unit during seven consecutive calendar days, and</p> <p><math>i</math> identifies each unit in the AECR.</p>	X	X

District Rule 4306 Requirements	Adopted September 18, 2003	Amended October 16, 2008
<p>Aggregated NOx emission factor: the sum of the actual NOx emissions during seven consecutive calendar days from all units in the AECF, divided by the sum of the heat input of all units in the AECF during seven consecutive calendar days. The aggregated emission factor is calculated as:</p> $E_A = \frac{\sum E_i F_i}{\sum F_i}$ <p>where: <math>E_A</math> is the aggregated NOx emission factor (lb/MMBtu),</p> <p><math>E_i</math> is the NOx emission factor (lb/MMBtu) for each unit in the AECF, established and verified by source testing, or continuous emission monitors,</p> <p><math>F_i</math> is the total heat input (hhv basis) of fuel (MMBtu) combusted in each unit during seven consecutive calendar days, and</p> <p><math>i</math> identifies each unit in the AECF.</p>	X	X
<p>9.6.1 The AECF shall: Contain all data, records, and other information necessary to determine eligibility of the units for alternative emission control, including but not limited to a list of units subject to alternative emission control, daily average and maximum hours of utilization for each unit, rated heat input of each unit, and fuel type for each unit. Present the methodology for recordkeeping and reporting required by Sections 9.6.4 and 9.6.5. Demonstrate that the aggregated emission factor will meet the requirements of Section 9.5. Demonstrate that the schedule for achieving AECF NOx emission levels is at least as expeditious as the schedule if applicable units were to comply individually with the applicable emission levels in Section 5.1 and the increments of progress in Section 7.0.</p>	X	
<p>9.6.1 The AECF shall contain all data, records, and other information necessary to determine eligibility of the units for alternative emission control, including but not limited to a list of units subject to alternative emission control, daily average and maximum hours of utilization for each unit, rated heat input of each unit, and fuel type for each unit. Present the methodology for recordkeeping and reporting required by Sections 9.6.4 and 9.6.5. Specify which NOx limit, either Standard Option or Enhanced Option, will be satisfied by the units under the AECF. Demonstrate that the aggregated emission factor will meet the requirements of Section 9.5. Demonstrate that the schedule for achieving AECF NOx emission levels is at least as expeditious as the schedule if applicable units were to comply individually with the applicable emission levels in Section 5.1 and the increments of progress in Section 7.0.</p>		X



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# ATTACHMENT G

Comments and Responses

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**Facility Comment:**

The following draft condition contained on the IC engine permits (PTOs '-2, '-10, and '-14) is administratively excessive if the engines are only allowed to operate on CARB certified fuels.

- The permittee shall maintain monthly records of the type of fuel purchased, the sulfur content of the fuel, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Y

Both the District and EPA agreed (see project file e-mail correspondence); and as such the condition has been revised to read:

- The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Y

The revised condition has replaced and been included on the final permits for the project.