San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUG 27 2013

Mr. Wade Ingram
Liberty Packing Company - The Morning Star Company
12045 S Ingomar Grade Road
Los Banos, CA 93635

Re: Final - Authority to Construct / COC (Significant Mod)
District Facility # N-1399
Project # N-1121905

Dear Mr. Ingram:

The Air Pollution Control Officer has issued Authorities to Construct (N-1399-17-3 and '-24-0) with Certificates of Conformity to Liberty Packing Company - The Morning Star Company at 12045 S Ingomar Grade Road, Los Banos, California.. This project involves installation of a new 471 MMBtu/hr natural gas-fired boiler which will be served by a selective catalytic reduction system, and modifications to the permit of an existing 260 MMBtu/hr natural gas-fired boiler (N-1399-17) to lower PM10 emission factor and install a continuous emissions monitoring system to measure NOx, CO and O2 concentrations. Enclosed are the Authorities to Construct and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permit was published on June 25, 2013. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on June 20, 2013. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

www.valleyair.org www.healthyairliving.com

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

Sincerely,

David Warner
Director of Permit Services

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Newspaper notice for publication in Merced Sun Star and for posting on valleyair.org

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NOTICE OF FINAL DECISION
FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT AND
THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY
MANDATED OPERATING PERMIT

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue Authorities to Construct to Liberty Packing Company - The Morning Star Company at 12045 S Ingomar Grade Road, Los Banos, California., California. This project involves installation of a new 471 MMBtu/hr natural gas-fired boiler which will be served by a selective catalytic reduction system, and modifications to the permit of an existing 260 MMBtu/hr natural gas-fired boiler (N-1399-17) to lower PM10 emission factor and install a continuous emissions monitoring system to measure NOx, CO and O2 concentrations.

No comments were received following the District's preliminary decision on this project.

The District's analysis of the legal and factual basis for this proposed action, project #N-1121905, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm, the SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356, and at any other District office. For additional information, please contact the District at (209) 557-6400.

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1399-17-3 **ISSUANCE DATE:** 08/21/2013

LEGAL OWNER OR OPERATOR: LIBERTY PACKING CO - THE MORNING STAR CO
MAILING ADDRESS: 12045 S INGOMAR GRADE RD
LOS BANOS, CA 93635

LOCATION: 12045 S INGOMAR GRADE RD
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:
MODIFICATION OF 260 MMBTU/HR NATURAL GAS FIRED NEBRASKA MODEL N2S-8/S-100-ECON BOILER WITH A TODD DRMB ULTRA LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION: TO INSTALL A CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) FOR MEASURING NOX, CO AND O2 CONCENTRATION AND REDUCE PM10 EMISSION FACTOR FROM 0.0076 LB/MMBTU TO 0.0074 LB/MMBTU

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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]
4. 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]
5. The facility-wide NOx emissions shall not exceed 33,705 pounds during any 12 consecutive month rolling period. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
N-1399-17-3 : Aug 21 2013 9:05AM – KAHLONJ Joint Inspection NOT Required

6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
8. 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]
9. The unit shall only be fired on PUC-quality natural gas with a sulfur content of no greater than 1.0 grains (gr) of sulfur per 100 standard cubic feet (scf) of natural gas. [District Rules 2201 and 4320, 40 CFR 60.42b9k)(1)(2)]
10. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in this unit shall be installed, utilized and maintained. [District Rule 2201, 40 CFR 60.49b(d)(1)]
11. Heat input to this unit shall not exceed 1,059,019 MMBtu during any 12 consecutive month rolling period. [District Rule 2201]
12. During start-up or shutdown, the emissions control system (i.e. FGR system) shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320]
13. The startup duration shall not exceed 2.0 hours per day. [District Rules 2201, 4306 and 4320]
14. The shutdown duration shall not exceed 1.0 hour per day. [District Rules 2201, 4306 and 4320]
15. The total duration of startups and shutdowns shall not exceed 41 hours during any 12 consecutive month rolling period. [District Rule 2201]
16. During startup and shutdown, NOx emissions shall not exceed 30.0 ppmvd @ 3% O2 or 0.036 lb/MMBtu over 1-hour averaging period. Each one-hour period shall commence on the hour. [District Rules 2201, 4305, 4306 and 4320, 40 CFR Part 60.13(h)(1)]
17. During startup and shutdown, CO emissions shall not exceed 200 ppmvd @ 3% O2 or 0.148 lb/MMBtu over 1-hour averaging period. Each one-hour period shall commence on the hour. [District Rules 2201, 4305, 4306 and 4320, 40 CFR Part 60.13(h)(1)]
18. Except during startup and shutdown, NOx emissions shall not exceed 7.0 ppmvd @ 3% O2 or 0.008 lb/MMBtu, referenced as NO2 over 1-hour averaging period. Each one-hour period shall commence on the hour. [District Rules 2201, 4305, 4306 and 4320, 40 CFR Part 60.13(h)(1)]
19. Except during startup and shutdown, CO emissions shall not exceed 50 ppmvd @ 3% O2 or 0.037 lb/MMBtu over 1-hour averaging period. Each one-hour period shall commence on the hour. [District Rules 2201, 4305, 4306 and 4320, 40 CFR Part 60.13(h)(1)]
20. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
21. PM10 emissions shall not exceed 0.0074 lb/MMBtu. [District Rule 2201]
22. VOC emissions shall not exceed 10 ppmvd @ 3% O2 or 0.0042 lb/MMBtu, referenced as methane. [District Rule 2201]
23. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081]
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
25. Source testing to measure startup and shutdown NOx and CO emissions shall be conducted within 60 days of initial startup under this permit. CEMS relative accuracy for NOx and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

26. Source testing to measure NOx and CO emissions during steady state operation shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rules 4305, 4306 and 4320]
27. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]
28. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
29. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
30. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320]
31. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
32. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
33. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
34. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
35. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO and O2 concentrations. CEMS shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080, 2201, 4305, 4306 and 4320, 40 CFR 60.48b(1)]
36. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS. [40 CFR 60.48b(e)]
37. The CEMS shall be operated and data recorded during all periods of operation except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. [40 CFR 60.48b(c)]
38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rules 1080, 2201, 4305, 4306 and 4320]
39. The NOx, CO and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specification 2 (PS 2) for NOx, Appendix B PS 4A for CO, and Appendix B PS 3 for O2 or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rules 1080, 2201, 4305, 4306 and 4320]
40. In accordance with 40 CFR Part 60, Appendix F, 5.1, NOx, CO and O2 CEMS must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rules 1080, 2201, 4305, 4306 and 4320]
41. The owner/operator shall perform a RATA for NOx, CO and O2 as specified by 40 CFR Part 60, Appendix F, 5.1.1, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the CEMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rules 1080, 2201, 4305, 4306 and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rules 1080, 2201, 4305, 4306 and 4320]

43. The CEMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rules 1080, 2201, 4305, 4306 and 4320]

44. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CEMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080]

45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEMS data polling software system and shall make CEMS data available to the District's automated polling system on a daily basis. [District Rule 1080]

46. Upon notice by the District that the facility's CEMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEMS data is sent to the District by a District-approved alternative method. [District Rule 1080]

47. The permittee shall maintain the following records for CEMS equipment: (1) Date, time and duration of any malfunction; (2) Date of performance testing; (3) Date of evaluations, calibrations, checks, and adjustments; and (4) Date and time period for which CEMS was inoperative. [District Rule 1080]

48. The owner or operator shall submit the performance test data and the performance evaluation of the CEMS using performance specification 2 (PS 2) for NOx, PS 4A for CO, and PS3 for O2 in 40 CFR Part 60 Appendix B. [40 CFR 60.49b(b)]

49. For 40 CFR Part 60 Subpart Db purpose, NOx emissions shall not exceed 0.1 lb/MMBtu for low heat release units (70,000 Btu/hr-ft3 of furnace volume or less) and 0.2 lb/MMBtu for high heat release units (greater than 70,000 Btu/hr-ft3 of furnace volume) on a 30-day rolling average basis. NOx standard shall apply at all times including periods of startup, shutdown, or malfunction. The permittee shall maintain record of the furnace volume, which is defined as the volume bounded by the front furnace wall where the burner is located, the furnace side waterfall, and extending to the level just below or in front of the first row of convection pass tubes. [40 CFR 60.44b(a), 60.44b(h), 60.44b(i)]

50. For the initial compliance test under 40 CFR Part 60 Subpart Db, NOx emissions shall be monitored for 30 successive steam generating unit operating days and the 30-day average emission rate shall be used to determine compliance with the NOx emission standard under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft3 of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft3 of furnace volume)). The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period. [40 CFR 60.46b(e)(1)]

51. Following the initial compliance test, the operator shall determine compliance with the NOx standard under 40 CFR 60.44 (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft3 of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft3 of furnace volume)) on a continuous basis through the use of a 30-day rolling average emission rate. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NOx emission data for the preceding 30 steam generating unit operating days. [40 CFR 60.46b(e)(3)]

52. The 1-hour average NOx emission rates measured by the continuous NOx monitor shall be expressed in lb/MMBtu heat input and shall be used to calculate the average emission rates under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft3 of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft3 of furnace volume)). The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(h)(2). [40 CFR 60.48b(d)]

53. When NOx data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data shall be obtained by using standby monitoring systems, Method 7 of Appendix A of Part 60, Method 7A of Appendix A of Part 60, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. [40 CFR 60.48b(f)]

CONDITIONS CONTINUE ON NEXT PAGE

54. The owner or operator shall maintain records of the amount of fuel combusted during each day in this unit. [District Rule 2201 and 40 CFR 60.49b(d)(1)]

55. The owner or operator shall maintain records of the annual capacity factor on a monthly basis.The annual capacity factor shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. [40 CFR 60.49b(d)(1)]

56. The owner or operator shall either obtain fuel receipts (such as a valid purchase contract, tariff sheet, or transportation contract) from the fuel supplier that certify that the gaseous fuel meets definition of natural gas (as defined in 40 CFR 60.41b) and the applicable sulfur limit (i.e., 1.0 gr-S/100 scf), or demonstrate that the combusted gas is provided from a PUC or FERC regulated source, or monitor the sulfur content within 60 days of initial startup and weekly thereafter. If the sulfur content is less than or equal to 1.0 gr/100 dscf for eight consecutive weeks, then the monitoring frequency shall be every six months. If the result of any six month monitoring demonstrates that the fuel does not meet the fuel sulfur content limit, weekly monitoring shall resume until compliance is demonstrated for eight consecutive weeks. [District Rule 4320, 40 CFR 60.45b(j), 60.49b(r)(2)]

57. The owner or operator shall maintain records and submit a written report each calendar quarter to the District containing the following information for each steam generating unit operating day: (1) Calendar date; (2) The average hourly NOx and CO emission rates (expressed as NO2) (ppmvd @ 3% O2 and lb/MMBtu heat input) measured or predicted; (3) The 30-day average NOx emission rates (lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days; (4) Identification of the steam generating unit operating days when the calculated 30-day average NOx emission rates are in excess of the NOx emissions standards under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft3 of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft3 of furnace volume)), with the reasons for such excess emissions as well as a description of corrective actions taken; (5) Identification of the steam generating unit operating days when the average hourly NOx and CO emission rates are in excess of the NOx and CO limits (startup, shutdown and steady state) in this permit, with the reason for such excess emissions as well as a description of corrective actions taken; (6) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (7) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data; (8) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted; (9) Identification of the times when the pollutant concentration exceeded full span of the CEMS; (10) Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3 or 4A; (11) Results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60; and (11) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080, 2201, 4305, 4306 and 4320, 40 CFR 60.49b(g), 40 CFR 60.49b(i), and 40 CFR 60.49b(w)]

58. The owner or operator of an affected facility may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 40 CFR 60.49b(v)]

59. The owner or operator shall keep records of the date, duration of each startup (hours), and duration of each shutdown (hours). [District Rule 2201]

60. The owner or operator shall keep records of the total duration of startups and shutdowns (hours) on a rolling 12 consecutive month total basis, and shall be updated at least monthly. [District Rule 2201]

61. The owner or operator shall keep record of the facility-wide NOx emissions (in pounds). The record shall be on a rolling 12 consecutive month total basis and shall be updated at least weekly. [District Rule 2201]

62. The owner or operator shall kep record of the annual heat input to this unit (in MMBtu). The record shall be kept on a rolling 12 consecutive month total basis and shall be updated at least weekly. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

63. The owner or operator shall maintain all records of required monitoring data and support information for a period of five years from the date of data entry and shall make such records available to the District upon request. [District Rules 1070, 2201, 4305, 4306, and 4320, 40 CFR 60.49b(o)]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1399-24-0 **ISSUANCE DATE:** 08/21/2013

LEGAL OWNER OR OPERATOR: LIBERTY PACKING CO - THE MORNING STAR CO
MAILING ADDRESS: 12045 S INGOMAR GRADE RD
LOS BANOS, CA 93635

LOCATION: 12045 S INGOMAR GRADE RD
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:
471 MMBTU/HR CLEAVER BROOKS MODEL NB-ED-110 BOILER EQUIPPED WITH A COEN MODEL VARIFLAME LOW NOX BURNER INDUCED FLUE GAS RECIRCULATION SERVED BY A CADASTACK (OR OTHER MANUFACTURER) SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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]
4. 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]
5. The facility-wide NOx emissions shall not exceed 33,705 pounds during any 12 consecutive month rolling period. [District Rule 2201]
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
N-1399-24-0 Aug 21 2013 11:55AM – KAHLONJ : Joint Inspection NOT Required

7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
8. 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]
9. The unit shall only be fired on PUC-quality natural gas with a sulfur content of no greater than 1.0 grains (gr) of sulfur per 100 standard cubic feet (scf) of natural gas. [District Rules 2201 and 4320, 40 CFR 60.42b9k)(1)(2)]
10. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in this unit shall be installed, utilized and maintained. [District Rule 2201, 40 CFR 60.49b(d)(1)]
11. Heat input to this unit shall not exceed 1,271,700 MMBtu during any 12 consecutive month rolling period. [District Rule 2201]
12. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320]
13. The startup duration shall not exceed 4.0 hours per day. [District Rules 2201, 4306 and 4320]
14. The shutdown duration shall not exceed 1.0 hour per day. [District Rules 2201, 4306 and 4320]
15. The total duration of startups and shutdowns shall not exceed 41 hours during any 12 consecutive month rolling period. [District Rule 2201]
16. During startup and shutdown, NOx emissions shall not exceed 30.0 ppmvd @ 3% O2 or 0.036 lb/MMBtu over 1-hour averaging period. Each one-hour period shall commence on the hour. [District Rules 2201, 4305, 4306 and 4320, 40 CFR Part 60.13(h)(1)]
17. During startup and shutdown, CO emissions shall not exceed 200 ppmvd @ 3% O2 or 0.148 lb/MMBtu over 1-hour averaging period. Each one-hour period shall commence on the hour. [District Rules 2201, 4305, 4306 and 4320, 40 CFR Part 60.13(h)(1)]
18. Except during startup and shutdown, NOx emissions shall not exceed 5.0 ppmvd @ 3% O2 or 0.0062 lb/MMBtu, referenced as NO2 over 1-hour averaging period. Each one-hour period shall commence on the hour. [District Rules 2201, 4305, 4306 and 4320, 40 CFR Part 60.13(h)(1)]
19. Except during startup and shutdown, CO emissions shall not exceed 50 ppmvd @ 3% O2 or 0.037 lb/MMBtu over 1-hour averaging period. Each one-hour period shall commence on the hour. [District Rules 2201, 4305, 4306 and 4320, 40 CFR Part 60.13(h)(1)]
20. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
21. PM10 emissions shall not exceed 0.003 lb/MMBtu. [District Rule 2201]
22. VOC emissions shall not exceed 5 ppmvd @ 3% O2 or 0.002 lb/MMBtu, referenced as methane. [District Rule 2201]
23. NH3 emissions shall not exceed 10 ppmvd @ 3% O2. [District Rule 2201]
24. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081]
25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
26. Source testing to measure startup and shutdown NOx and CO emissions shall be conducted within 60 days of initial startup under this permit. CEMS relative accuracy for NOx and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). [District Rule 2201]
27. Source testing to measure steady state NOx, CO, PM10, VOC and NH3 emissions shall be conducted within 60-days of the initial startup. [District Rules 2201, 4305, 4306 and 4320]

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28. Source testing to measure NOx, CO and NH3 emissions during steady state operation shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rules 4305, 4306 and 4320]
29. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]
30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
31. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
32. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320]
33. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 2201]
34. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
35. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
36. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
37. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
38. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO and O2 concentrations. CEMS shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080, 2201, 4305, 4306 and 4320, 40 CFR 60.48b(1)]
39. The owner or operator shall monitor and record the stack concentration of NH3 at least once during each month in which source testing is not performed. NH3 monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. Monitoring shall not be required if unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit(s) unless it has been performed within the last month. [District Rule 2201]
40. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS. [40 CFR 60.48b(e)]
41. The CEMS shall be operated and data recorded during all periods of operation except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. [40 CFR 60.48b(c)]
42. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rules 1080, 2201, 4305, 4306 and 4320]
43. The NOx, CO and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specification 2 (PS 2) for NOx, Appendix B PS 4A for CO, and Appendix B PS 3 for O2 or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rules 1080, 2201, 4305, 4306 and 4320]

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44. In accordance with 40 CFR Part 60, Appendix F, 5.1, NOx, CO and O2 CEMS must be audited at least once each calendar quarter, by conducting cylinder gas audits (CGA) or relative accuracy audits (RAA). CGA or RAA may be conducted three of four calendar quarters, but no more than three calendar quarters in succession. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rules 1080, 2201, 4305, 4306 and 4320]

45. The owner/operator shall perform a RATA for NOx, CO and O2 as specified by 40 CFR Part 60, Appendix F, 5.1.1, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the CEMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rules 1080, 2201, 4305, 4306 and 4320]

46. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rules 1080, 2201, 4305, 4306 and 4320]

47. The CEMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rules 1080, 2201, 4305, 4306 and 4320]

48. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CEMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080]

49. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEMS data polling software system and shall make CEMS data available to the District's automated polling system on a daily basis. [District Rule 1080]

50. Upon notice by the District that the facility's CEMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEMS data is sent to the District by a District-approved alternative method. [District Rule 1080]

51. The permittee shall maintain the following records for CEMS equipment: (1) Date, time and duration of any malfunction; (2) Date of performance testing; (3) Date of evaluations, calibrations, checks, and adjustments; and (4) Date and time period for which CEMS was inoperative. [District Rule 1080]

52. The owner or operator shall submit the performance test data and the performance evaluation of the CEMS using performance specification 2 (PS 2) for NOx, PS 4A for CO, and PS3 for O2 in 40 CFR Part 60 Appendix B. [40 CFR 60.49b(b)]

53. For 40 CFR Part 60 Subpart Db purpose, NOx emissions shall not exceed 0.1 lb/MMBtu for low heat release units (70,000 Btu/hr-ft3 of furnace volume or less) and 0.2 lb/MMBtu for high heat release units (greater than 70,000 Btu/hr-ft3 of furnace volume) on a 30-day rolling average basis. NOx standard shall apply at all times including periods of startup, shutdown, or malfunction. The permittee shall maintain record of the furnace volume, which is defined as the volume bounded by the front furnace wall where the burner is located, the furnace side waterfall, and extending to the level just below or in front of the first row of convection pass tubes. [40 CFR 60.44b(a), 60.44b(h), 60.44b(i)]

54. For the initial compliance test under 40 CFR Part 60 Subpart Db, NOx emissions shall be monitored for 30 successive steam generating unit operating days and the 30-day average emission rate shall be used to determine compliance with the NOx emission standard under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft3 of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft3 of furnace volume)). The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period. [40 CFR 60.46b(e)(1)]

55. Following the initial compliance test, the operator shall determine compliance with the NOx standard under 40 CFR 60.44 (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft3 of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft3 of furnace volume)) on a continuous basis through the use of a 30-day rolling average emission rate. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NOx emission data for the preceding 30 steam generating unit operating days. [40 CFR 60.46b(e)(3)]

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56. The 1-hour average NOx emission rates measured by the continuous NOx monitor shall be expressed in lb/MMBtu heat input and shall be used to calculate the average emission rates under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft3 of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft3 of furnace volume)). The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(h)(2). [40 CFR 60.48b(d)]

57. When NOx data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data shall be obtained by using standby monitoring systems, Method 7 of Appendix A of Part 60, Method 7A of Appendix A of Part 60, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. [40 CFR 60.48b(f)]

58. The owner or operator shall maintain records of the amount of fuel combusted during each day in this unit. [District Rule 2201 and 40 CFR 60.49b(d)(1)]

59. The owner or operator shall maintain records of the annual capacity factor on a monthly basis.The annual capacity factor shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. [40 CFR 60.49b(d)(1)]

60. The owner or operator shall either obtain fuel receipts (such as a valid purchase contract, tariff sheet, or transportation contract) from the fuel supplier that certify that the gaseous fuel meets definition of natural gas (as defined in 40 CFR 60.41b) and the applicable sulfur limit (i.e., 1.0 gr-S/100 scf), or demonstrate that the combusted gas is provided from a PUC or FERC regulated source, or monitor the sulfur content within 60 days of initial startup and weekly thereafter. If the sulfur content is less than or equal to 1.0 gr/100 dscf for eight consecutive weeks, then the monitoring frequency shall be every six months. If the result of any six month monitoring demonstrates that the fuel does not meet the fuel sulfur content limit, weekly monitoring shall resume until compliance is demonstrated for eight consecutive weeks. [District Rule 4320, 40 CFR 60.45b(j), 60.49b(r)(2)]

61. The owner or operator shall maintain records and submit a written report each calendar quarter to the District containing the following information for each steam generating unit operating day: (1) Calendar date; (2) The average hourly NOx and CO emission rates (expressed as NO2) (ppmvd @ 3% O2 and lb/MMBtu heat input) measured or predicted; (3) The 30-day average NOx emission rates (lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days; (4) Identification of the steam generating unit operating days when the calculated 30-day average NOx emission rates are in excess of the NOx emissions standards under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft3 of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft3 of furnace volume)), with the reasons for such excess emissions as well as a description of corrective actions taken; (5) Identification of the steam generating unit operating days when the average hourly NOx and CO emission rates are in excess of the NOx and CO limits (startup, shutdown and steady state) in this permit, with the reason for such excess emissions as well as a description of corrective actions taken; (6) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (7) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data; (8) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted; (9) Identification of the times when the pollutant concentration exceeded full span of the CEMS; (10) Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3 or 4A; (11) Results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60; and (11) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080, 2201, 4305, 4306 and 4320, 40 CFR 60.49b(g), 40 CFR 60.49b(i), and 40 CFR 60.49b(w)]

62. The owner or operator of an affected facility may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 40 CFR 60.49b(v)]

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63. The owner or operator shall keep records of the date and time, measured NH3 concentration, O2 concentration in percent, and NH3 concentration corrected to 3% O2. [District Rule 2201]

64. The owner or operator shall keep records of the date, duration of each startup (hours), and duration of each shutdown (hours). [District Rule 2201]

65. The owner or operator shall keep records of the total duration of startups and shutdowns (hours) on a rolling 12 consecutive month total basis, and shall be updated at least monthly. [District Rule 2201]

66. The owner or operator shall keep record of the facility-wide NOx emissions (in pounds). The record shall be on a rolling 12 consecutive month total basis and shall be updated at least weekly. [District Rule 2201]

67. The owner or operator shall kep record of the annual heat input to this unit (in MMBtu). The record shall be kept on a rolling 12 consecutive month total basis and shall be updated at least weekly. [District Rule 2201]

68. The owner or operator shall maintain all records of required monitoring data and support information for a period of five years from the date of data entry and shall make such records available to the District upon request. [District Rules 1070, 2201, 4305, 4306, and 4320, 40 CFR 60.49b(o)]