



OCT 31 2013

Escalon Premier Brands  
Scott Adrian  
Ref: H.J. Heinz Company  
1905 McHenry Avenue  
Escalon, CA 95320

**Re: Notice of Preliminary Decision – Emission Reduction Credits**  
**Facility Number: N-395**  
**Project Number: N-1123783**

Dear Mr. Adrian:

Enclosed for your review and comment is the District's analysis of H.J. Heinz Company's application for Emission Reduction Credits (ERCs) resulting from shutdown of the entire facility, at 2800 South El Dorado Street in Stockton, California. The quantity of ERCs proposed for banking is 1,851 metric tons CO<sub>2</sub>e/yr.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Wai-Man So of Permit Services at (209) 557- 6449.

Sincerely,

David Warner  
Director of Permit Services

DW:WMS

Enclosures

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

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

# San Joaquin Valley Air Pollution Control District GHG ERC Banking Application Review

Processing Engineer: Wai-Man So  
Lead Engineer: Nick Peirce  
Date: August 15, 2013

Facility Name: H.J. Heinz Company  
Mailing Address: Escalon Premier Brands  
1905 McHenry Avenue  
Escalon, CA 95320

Contact Person: Scott Adrian (Plant Manager)  
Telephone: (209) 552 – 6015  
Email: [Scott.Adrian@us.hjheinz.com](mailto:Scott.Adrian@us.hjheinz.com)

Other Contact: Leland McPherrin (Senior Project Engineer)  
Telephone: (209) 679 – 1667  
Email: [LelandMcPherrin@us.hjheinz.com](mailto:LelandMcPherrin@us.hjheinz.com)

Facility Location: 2800 South California Street,  
Stockton, CA 95206

Applications Received: June 4, 2012  
Deemed Complete: August 14, 2013  
Permits #: N-395-14-0  
Project #: N-1123783

ERC Certification number: N-1132-24

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## I. Proposal

H.J. Heinz Company (hereinafter Heinz) has submitted an application for Emission Reduction Credits (ERCs) banking for both criteria pollutants and greenhouse gas (GHG) due to the shutdown of the entire facility. The ERC banking application was split into two projects, one for criteria pollutant ERCs banking that was processed under project N-1121415, and other for GHG ERCs banking under this project.

District Rule 2301 section 4.5 specifies several eligibility criteria for GHG emission reductions banking, including that the emission reductions must be permanent. When determining the geographical boundary in which the emission reduction is determined to be permanent the applicant may consider how the GHG ERCs may likely be used.

Heinz has selected San Joaquin Valley Air Pollution Control District (hereinafter SJVAPCD) as the geographical boundary for which the emission reduction is permanent. Information has been provided to validate this geographical boundary selection. Using this geographical boundary, it was determined that the GHG emission reduction is permanent within District. See detail permanency determination in section VI.6.E of this document.

As explained in project N-1121415, the applicant proposed to only bank the emission reductions resulting from the shutdown of the 16.8 MMBtu/hr natural gas-fired boiler under permit unit N-395-14. The amount of bankable GHG ERCs for shutdown of permit unit N-395-14 is summarized in the table below:

Pollutant	Amount (metric ton/year)
CO <sub>2</sub> e	1,851

**II. Applicable Rules**

Rule 2301 Emission Reduction Credit Banking (01/19/12)

**III. Location of Reduction:**

The facility was located at 2800 South California Street in Stockton, California.

**IV. Method of Generating Reductions:**

The emissions reductions were generated by shutdown the entire stationary source. The equipment under the following permit unit was removed from the site on April 4, 2012:

N-395-14-0:

16.8 MMBtu/hr Hurst Boiler with a Powerflame ultra low NO<sub>x</sub> burner

**V. Calculations**

**A. Assumption:**

- 1 short ton of CO<sub>2</sub>e is equal to 0.9072 metric ton of CO<sub>2</sub>.
- The results of all Historical Actual Emission (HAE) and Actual Emission Reduction (AER) calculations are rounded to the nearest metric ton.

**B. Emission factors:**

Emission factors and global warming potentials (GWP) are taken from the California Climate Change Action Registry (CCAR), Version 3.1, January 2009, Appendix C, Tables C.7 and C.8. The emission factors that utilize to calculate Actual Emissions Reduction (AER) are summarized in the table below:

GHG	Emission Factors & GWP (SAR, 1996)		Source
CO <sub>2</sub>	116.7 lb/MMBtu	1 lb CO <sub>2</sub> e/lb-CO <sub>2</sub>	CCAR, Appendix C, Tables C1 & C7
CH <sub>4</sub>	0.011 lb/MMBtu	21 lb CO <sub>2</sub> e/lb-CH <sub>4</sub>	CCAR, Appendix C, Tables C1 & C8
N <sub>2</sub> O	0.00022 lb/MMBtu	310 lb CO <sub>2</sub> e/lb-N <sub>2</sub> O	CCAR, Appendix C, Tables C1 & C8

**C. Baseline Period Determination:**

Section 3.8 of District Rule 2201 defines the baseline period as “two consecutive years of operation immediately prior to the submission of the complete application” or “another time period of at least two consecutive years within the five years immediately prior to the submission of the complete application if it is more representative of normal source operation”.

As determined in the criteria pollutant ERCs banking project N-1121415, the consecutive two-year period immediately preceding the banking application was not representative of normal source operation. The District determined the baseline period that was most representative of normal source operations to be Q1 2009 through Q4 2010, so the same baseline period will be used to determine the GHG ERCs under this project.

**D. Baseline Period Data:**

As explained in project N-1121415, the short process was relocated to a private facility in Los Banos (not a Heinz’s facility) within the District. Therefore, the natural gas fuel usage to support the short process was subtracted from the overall fuel usage of the boiler to determine the actual emission reductions for shutdown the boiler. The actual fuel usage was summarized in the table below:

Calendar Year	Overall NG Usage (MMBtu/year)	Short Process NG Usage (MMBtu/year)	Boiler Actual NG Usage (MMBtu/year)
2009	39,859	41	39,818
2010	29,983	57	29,926
Average			34,872

**E. Historical Actual Emissions (HAE)**

Historical Actual Emissions (HAEs) are emissions that actually occurred. The historical actual emissions from this permit unit are calculated below:

$$PE\ CO_2e = \{[(34,872\ MMBtu/year \times 116.7\ lb-CO_2/MMBtu) + (34,872\ MMBtu/year \times 0.011\ lb-CH_4/MMBtu \times 21\ lb-CO_2e/lb-CH_4) + (34,872\ MMBtu/year \times 0.00022\ lb-N_2O/MMBtu \times 310\ lb-CO_2e/lb-N_2O)] \div 2,000\ lb/ton\}$$

$$PE\ CO_2e = 2,040\ tons-CO_2e/year$$

Convert the above calculated CO<sub>2</sub> emission in an equivalent number of metric tons as follow:

$$PE\ CO_2e = 2,040\ short\ tons-CO_2e/year \times 0.9072\ metric\ ton/short\ ton = 1,851\ metric\ tons/year$$

## F. Actual Emissions Reductions

Per District Rule 2201, section 4.12, Actual Emissions Reductions (AER) shall be calculated as follows:

$$\text{AER} = \text{HAE} - \text{PE2}$$

Where:

HAE = Historic Actual Emissions

PE2 = Post Project Potential to Emit

Since the applicant proposed to shutdown the entire facility, therefore, the PE2 from the permit unit is equal to zero. AER is equal to HAE, unless the HAE must be reduced such that they are surplus. As shown in section VI.D of this document, all HAE are surplus.

## G. Bankable Emissions Reductions

The bankable ERC of this project is summarized in the table below:

GHG	Metric tons/year
CO <sub>2</sub> e	1,851

## VI. Compliance

Pursuant to Rule 2301, section 4.5, the following criteria must be met in order to deem the GHG reductions eligible for banking:

### §4.5.1

The GHG emission reduction must have actually occurred on or after January 1, 2005, except as allowed in specific CARB approved GHG emission reduction project protocols.

This criteria has been met, since the emission reductions occurred when the equipment, boiler was removed from the site on April 4, 2012. In addition, this emission reduction project is not one of the CARB approved emission reduction project protocols listed in Title 17, Section 95990(c)(5) of the Cap-and-Trade Regulation.

### §4.5.2

The GHG emission reductions must have occurred within the San Joaquin Valley Unified Air Pollution Control District.

This criteria has been met, since the emission reductions occurred at 2800 South California Street in Stockton, California.

### §4.5.3

The GHG emission reductions are real, enforceable, quantifiable, surplus, and permanent.

**A. Real**

The emissions reductions are real since the reductions were generated by permanent shutdown the entire ketchup production facility.

**B. Enforceable**

The reductions are enforceable since all permit units have been surrendered to the District. Operating the equipment without permits would result in enforcement action being taken.

**C. Quantifiable**

The reductions are quantifiable since the reductions were calculated utilizing District-approved emission factors, and actual baseline period natural gas fuel usages.

In addition, pursuant to Rule 2301, section 6.15, the following notation shall be included in the GHG emission reduction credit certificate to ensure the reductions are quantifiable:

*"This emission reduction is surplus and additional to all applicable regulatory requirements."*

**D. Surplus**

- 1) This facility is not subject to the CARB greenhouse gas cap and trade program.
- 2) The greenhouse gas emission reductions were made voluntarily and were not required by any present or pending law, rule, or regulation.
- 3) The greenhouse gas emission reductions are not the result of any requirement, including any requirement that is not intended to control greenhouse gases.

In conclusion, the emission reductions from the shutdown of the ketchup production facility are surplus and additional of all requirements. The notation listed above will include in the emission reductions credit certificate.

**E. Permanent**

District Rule 2301 section 4.5 specifies that the emission reductions must be permanent. When determining the geographical boundary in which the emission reduction is determined to be permanent the applicant may consider how the GHG ERCs may likely be used.

Please note that while Rule 2301 allows facilities to receive ERCs for GHG emission reductions, the District does not have any limitations on how the GHG ERCs may be used. However, it is anticipated that the likely uses of such GHG ERCs would be their future retirement as GHG mitigation in the California Environmental Quality Act (CEQA) process.

Pursuant to the CEQA, lead agencies must consider the environmental impact of GHG emissions from a project and may require that such GHG emissions be mitigated. In evaluating various mitigation techniques, including the retirement of GHG ERCs, the lead agency must determine if the proposed mitigation technique adequately mitigates the projects GHG emission increase.

When a lead agency determines if the retirement of a particular GHG ERC provides adequate GHG mitigation for a project, the lead agency may choose to consider the location where the GHG ERC was generated and the geographical boundary used to determine the permanence of the emission reductions. In making this determination, the lead agency may conclude that the retirement of a particular GHG ERC would provide adequate mitigation for projects within that same geographical boundary. Again, that determination will be made by the lead agency for a particular project.

For this application, the ketchup production operation has been permanently shut down, and all of the facility's Permits to Operate have surrendered to the District. Operation of the equipment without permits would result in enforcement action. Moreover, there is no clear evidence that the ketchup production from this facility will be shifted to other facilities in the District, since the applicant confirmed that Heinz has no other ketchup production facilities within the District.

Heinz currently has three facilities in the District:

Facility Name	Facility ID	Physical Address
H.J. Heinz Company, LP (Escalon Premier Brands)	N-314	1905 McHenry Avenue., Escalon, CA 95320
Heinz Seed	N-8760	6755 CE Dixon Street, Stockton, CA95206
Heinz Ag Research Farm	N/A	9900 S. Jack Tone Road, San Joaquin County, CA 95215

H.J Heinz Company, LP (Escalon Premier Brands)

This facility is a tomato cannery which packs tomatoes into various forms of canned tomatoes, tomato dices, sauces, purees, and paste. The applicant confirmed that there is no ketchup production operation and ketchup making equipment in this facility.

Heinz Seed

The is a tomato seed processing facility which cleans and packs the received tomato seed then ships to their contracted farmers for tomatoes growing purposes. The applicant confirmed that there is no ketchup production operation or ketchup processing equipment in this facility.

Heinz Ag Research Farm

This is a research farm which focuses on tomato growing methods. The applicant confirmed that there is no ketchup production operation or ketchup processing equipment in this facility.

Heinz has selected District as the geographical boundary for which the emission reduction is permanent. Therefore, the following will be included in the emission reductions credit certificate:

“Verified as permanent within the San Joaquin Valley Air Pollution Control District”

#### §4.5.4

GHG emission reductions are calculated as the difference between the historic annual average GHG emissions (as CO<sub>2</sub>e) calculated using the consecutive 24 month period immediately prior to the date the emission reduction occurred, or another consecutive 24 month period in the 60 months prior to the date the emission reduction occurred if determined by the APCO as being more representative of normal operations, and the potential GHG emissions (as CO<sub>2</sub>e) after the project is complete, except as provided in section 4.5.5.

The GHG emission reductions were calculated according to the baseline period determined in section V.C of this document.

#### §4.5.5

GHG emission reductions proposed to be quantified using CARB approved emission reduction project protocols shall be calculated in accordance with the applicable protocol.

The proposed GHG emission reductions project was not one of the CARB approved emission reduction project protocols listed in Title 17, Section 95990(c)(5) of the Cap-and-Trade Regulation. Therefore, the emission reductions credits were not quantified using CARB approved emission reduction protocols.

#### §4.5.6

Emission reduction credits shall be made enforceable through permit conditions.

The reductions are enforceable since the permit unit has been surrendered to the District. Operating the equipment without permit would result in enforcement action being taken.

Section 5.0 of this rule identifies the following ERC certification application procedures:

#### §5.2.2

For GHG emission reduction covered under section 4.5.1 that occur on or after January 19, 2012 ERC certificate applications shall be submitted within 180 days after the emission reduction occurs.

As discussed in project N-1121415, the 16.8 MMBtu/hr natural gas-fired boiler was removed from the site on April 4, 2012. The emissions reduction banking application was received on June 2, 2012. Therefore, the application was received within 180 days of the date the reductions occurred. The ERC application was filed in a timely manner.



Section 6.15 of this rule requires that GHG emission reduction certificates shall include a notation that indicates how the emission reductions were quantified:

**§6.15.3**

Emission reductions that are surplus of any regulatory requirement pursuant to section 4.5.3.4 shall include the following notation "This emission reduction is surplus and additional to all applicable regulatory requirements."

The GHG emission reductions that occur under this application are not the result of any requirement, including any requirement that is not intended to control GHG. Therefore, the emission reductions are surplus and additional of all requirements, and the above notation will be listed on the emission reduction credit certificate.

**VII. Recommendation**

Pending a successful public noticing period, issue GHG Emission Reduction Credit Certificate to H.J. Heinz Company for the following amount:

GHG	Metric tons/year
CO <sub>2</sub> e	1,851

**Appendices**

- Appendix I Permit to Operate (PTO) N-395-14-0
- Appendix II Draft Emissions Reduction Credit Certificate

# Appendix I

Permit to Operate (PTO)  
N-395-14-0

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-395-14-0

EXPIRATION DATE: 08/31/2013

## EQUIPMENT DESCRIPTION:

16.8 MMBTU/HR HURST BOILER WITH A POWERFLAME ULTRA LOW NOX BURNER

## PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
5. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306]
6. NOx emissions shall not exceed 9.0 ppmvd @ 3% O2 referenced as NO2. [District Rules 2201, 4305, and 4306]
7. CO emissions shall not exceed 100 ppmvd @ 3% O2. [District Rules 2201, 4305, and 4306]
8. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
9. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
10. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
11. NOx emissions from the District permitted boilers/steam generators at this facility shall not exceed 819 pounds in the 2nd quarter and 2,390 pounds in the 3rd quarter in order to validate Emission Reduction Credits (ERC) banked under original certificate N-445-2. [District Rule 2201]
12. CO emissions from the District permitted boilers/steam generators at this facility shall not exceed 5,510 pounds in the 3rd quarter in order to validate ERC banked under original certificate N-445-3. [District Rule 2201]
13. VOC emissions from the District permitted boilers/steam generators at this facility shall not exceed 410 pounds in the 3rd quarter in order to validate ERC banked under original certificate N-445-1. [District Rule 2201]
14. SOx emissions from the District permitted boilers/steam generators at this facility shall not exceed 212 pounds in the 3rd quarter in order to validate ERC banked under original certificate N-445-5. [District Rule 2201]
15. PM10 emissions from the District permitted boilers/steam generators at this facility shall not exceed 566 pounds in the 3rd quarter in order to validate ERC banked under original certificate N-445-4. [District Rule 2201]
16. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

17. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306]
18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306]
19. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306]
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306]
21. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (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 twelve (12) months. [District Rules 4305 and 4306]
22. 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]
23. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rules 4305 and 4306]
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306]
25. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306]
26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306]
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
28. The permittee shall maintain a daily record of natural gas consumed by this unit. [District Rules 2201]
29. The permittee shall maintain a cumulative quarterly records of natural gas consumed by all the boilers/steam generators permitted at this facility to show compliance with the quarterly emissions limits. [District Rule 2201]
30. The permittee shall maintain a record of NO<sub>x</sub> emissions in 2nd quarter from all the permitted boilers/steam generators. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

31. The permittee shall maintain a record of NOx emissions in 3rd quarter from all the permitted boilers/steam generators. [District Rule 2201]
32. The permittee shall maintain a record of CO emissions in 3rd quarter from all the permitted boilers/steam generators. [District Rule 2201]
33. The permittee shall maintain a record of VOC emissions in 3rd quarter from all the permitted boilers/steam generators. [District Rule 2201]
34. The permittee shall maintain a record of SOx emissions in 3rd quarter from all the permitted boilers/steam generators. [District Rule 2201]
35. The permittee shall maintain a record of PM10 emissions in 3rd quarter from all the permitted boilers/steam generators. [District Rule 2201]
36. 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, 4305, and 4306]

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

## **Appendix II**

### **Draft Emissions Reductions Credit Certificate**

San Joaquin Valley  
Air Pollution Control District

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718

**Emission Reduction Credit Certificate**

**DRAFT**  
N-1132-24

ISSUED TO: H. J. HEINZ COMPANY  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: 2800 S CALIFORNIA  
STOCKTON, CA 95206

**For CO2E Reduction In The Amount Of:**

1851 metric tons / year

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Shutdown of the 16.8 MMBtu/hr Hurst boiler verified as permanent within the San Joaquin Valley Air Pollution Control District

Emission Reduction Qualification Criteria

This emission reduction is surplus and additional to all applicable regulatory requirements.

Seyed Sadredin, Executive Director / APCO

**DRAFT**

David Warner, Director of Permit Services

Stockton Record

Newspaper notice for publication in Stockton Record and for posting on valleyair.org

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**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED ISSUANCE OF  
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to H.J. Heinz Company for shutdown of the entire facility, at 2800 South El Dorado Street in Stockton, California. The quantity of ERCs proposed for banking is 1,851 metric tons CO<sub>2</sub>e/yr.

The analysis of the regulatory basis for this proposed action, Project #N-1123783, 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 at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by December 4, 2013 to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**