



NOV 06 2013

Joe Rossi
San Joaquin Valley Concentrates
5631 E. Olive Ave.
Fresno, CA 93727

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: C-3275
Project Number: C-1130355

Dear Mr. Rossi:

Enclosed for your review and comment is the District's analysis of San Joaquin Valley Concentrates's application for Emission Reduction Credits (ERCs) resulting from shutdown of their 12.6 MMBtu/hr Hurst model S4-X-300-250 series 400 natural gas-fired boiler and surrender of permit C-3275-1-3, at 5631 E. Olive Avenue, Fresno. The quantity of ERCs proposed for banking is 53 lb-NOx/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. Dennis Roberts of Permit Services at (559) 230- 5919.

Sincerely,



David Warner
Director of Permit Services

DW:dr

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
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

Emission Reduction Credit Banking Application Review

Shutdown of 12.6 MMBtu/hr Hurst Natural Gas-Fired Boiler

Processing Engineer: Dennis Roberts

Lead Engineer: Martin Keast

Date: March 4, 2013

Facility Name: San Joaquin Valley Concentrates
Mailing Address: 5631 E. Olive Avenue
Fresno, CA 93727

Primary Contact: Jorge Ortiz
Phone: (559) 458-2810

Applicant: Joe Rossi
Phone: (559) 458-2500

Facility Location: 5631 E. Olive Ave
Fresno, CA 93727

Deemed Complete Date: February 21, 2013
Project Number: C-1130355

I. Summary:

San Joaquin Valley Concentrates produces red and white grape concentrate at their facility in Fresno, CA. The facility shutdown their 12.6 MMBtu/hr Hurst model S4-X-300-250 series 400 natural gas-fired boiler and surrendered permit C-3275-1-3. The facility is applying for NO_x emissions reduction credits for the shutdown of the boiler. A copy of the surrendered PTO is included in Attachment A of this document.

Based on the historical operating data prior to the shutdown, the amounts of bankable Actual Emission Reductions (AER's) for NO_x emissions are as shown in the table below. These values are calculated in Section V of this document:

Bankable Emissions Reductions Credits (ERC's)				
Pollutant	1st Qtr. ERC's (lb/qtr)	2nd Qtr. ERC's (lb/qtr)	3rd Qtr. ERC's (lb/qtr)	4th Qtr. ERC's (lb/qtr)
NO_x	13	13	12	15

II. Applicable Rules:

Rule 2201 - New and Modified Stationary Source Review Rule (4/21/11)

Rule 2301 - Emission Reduction Credit Banking (12/17/92)

Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)

III. Location of Reductions:

Physical Location of Equipment: 5631 E. Olive Avenue in Fresno, CA.

IV. Method of Generating Reductions:

The AER's were generated by shutting down the 12.6 MMBtu/hr Hurst natural gas-fired boiler. The equipment description for the unit is as follows:

C-3275-1-3:

12.6 MMBTU/HR HURST MODEL S4-X-300-250 SERIES 400 NATURAL GAS-FIRED BOILER WITH LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR)

V. Calculations:

A. Assumptions

- Annual and quarterly emissions will be rounded to the nearest whole pound in accordance with District Policy APR-1105, Use of Significant Figures, Sections I, III, and IV.
- Boiler is only fired on natural gas.
- Heating value (HV) of natural gas is 942 Btu/scf (per applicant)

B. Emission Factors (EF's)

Emission factors used to determine the emissions from the shutdown boilers will be the most conservative after review of all those applicable. Per District Policy APR-1110, the emission factor hierarchy in regards to accuracy is as follows, in descending order:

1. Continuous Emissions Monitoring (CEM) data from the emission point(s) in question
2. Source test data from the emission point(s) in question
3. Manufacturer's guarantee
4. CEM data at similar emission points
5. Source test data at similar emission points
6. AP-42 or industry derived emission factors

A review of the permit shows that the emission factors imposed on the permits is compliance with District Rule 4306. It is also noted that the boiler is required to

source test as prescribed by District Rules 4305 and 4306. The source test data from this boiler is the most accurate of the emission factor hierarchy for this boiler.

The following table summarizes the applicable emission factors based on the PTO and source test data.

Boiler	Source	NOx
C-3275-1	PTO	30 ppmvd @ 3% O ₂ or 0.036 lb/MMBtu
	Source Test April 19, 2012	20.9 ppmvd @ 3% O ₂ or 0.025 lb/MMBtu

District Rule 4320

Since the boiler will be subject to District Rule 4320 requirement by January 1, 2014, the rule requirement will be used instead of the permitted emission factors or source test data to calculate Historical Actual Emissions (HAE)

Boiler	Source	NOx
C-3275-1	District Rule 4320	9 ppmvd @ 3% O ₂ or 0.011 lb/MMBtu

C. Baseline Period Determination and Data

Baseline Period Determination:

In accordance with District Rule 2201, Section 3.8, the baseline period is the two consecutive years of operation immediately prior to the submission of the complete application; or another 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 operations.

Application to bank the Emission Reduction Credits (ERCs) from the shutdown of the operation was submitted on February 15, 2013. Although the boiler was in place and operable until it was removed at the end of August 2012, the applicant states that the boiler last operated in July 2012. Since, the time period immediately before the application was a period of non-operation, we cannot consider this period representative of normal source operation. Therefore, the representative period from July 2010 through June 2012 will be the period of at least two consecutive years of operation within the five-year period immediately prior to submission of the complete application.

From the monthly natural gas consumption records submitted by the applicant (Attachment C), the monthly and average quarterly records of natural gas

usage information supplied by the applicant for the period July 2010 through June 2012 is as follows:

Month/Year	Monthly Natural Gas Usage (scf)	Quarterly Average Natural Gas Usage (scf)
July 2010	986,000	1,161,333
August 2010	1,512,000	
September 2010	986,000	
October 2010	2,070,000	1,770,667
November 2010	1,713,000	
December 2010	1,529,000	
January 2011	1,014,000	1,042,333
February 2011	842,000	
March 2011	1,271,000	
April 2011	1,193,000	1,374,000
May 2011	1,605,000	
June 2011	1,324,000	
July 2011	1,240,000	1,299,667
August 2011	712,000	
September 2011	1,947,000	
October 2011	2,296,000	1,417,000
November 2011	1,168,000	
December 2011	787,000	
January 2012	2,435,000	1,651,333
February 2012	1,330,000	
March 2012	1,189,000	
April 2012	1,644,000	1,324,000
May 2012	902,000	
June 2012	1,426,000	

D. Historical Actual Emissions (HAE's)

Historical Actual Emissions (HAE) are emissions having actually occurred and are calculated using natural gas consumption and recognized emission factors, per Rule 2201, Section 3.21. For the purposes of ERC banking, creditable emissions are emissions from a source which can be demonstrated as having actually occurred. The actual emissions will be determined as follows:

The annual Historical Actual Emissions (HAE) are calculated by multiplying the emission factors for each pollutant (in lb/MMBtu) by the heat input for that quarter (in MMBtu).

	Quarterly Average Natural Gas Usage (scf)	Heat Input (MMBtu)	Emission Factor (lb-NOx/MMBtu)	Quarterly Emissions (lb-NOx/qtr)
3 rd Qtr 2010	1,161,333	1,094	0.011	12
4 th Qtr 2010	1,770,667	1,668		18
1 st Qtr 2011	1,042,333	982		11
2 nd Qtr 2011	1,374,000	1,294		14
3 rd Qtr 2011	1,299,667	1,224		13
4 th Qtr 2011	1,417,000	1,335		15
1 st Qtr 2012	1,651,333	1,556		17
2 nd Qtr 2012	1,324,000	1,247		14

1.3

Heat Input (MMBtu) = Natural Gas Usage (scf) x 942 Btu/scf x MMBtu/10⁶ Btu

The following calculation is representative of the quarterly emissions.

$$1^{\text{st}} \text{ Quarter Emissions} = (1^{\text{st}} \text{ Qtr 2011} + 1^{\text{st}} \text{ Qtr 2012})/2$$

1 st Quarter Emissions	14 lb-NOx/qtr
2 nd Quarter Emissions	14 lb-NOx/qtr
3 rd Quarter Emissions	13 lb-NOx/qtr
4 th Quarter Emissions	17 lb-NOx/qtr

E. Adjustments to HAE's

Pursuant to Section 3.23 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reduction which, is:

- required or encumbered by any laws, rules, regulations, agreements, orders, or
- attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or
- proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

Adjustment for Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr:

The HAE was calculated using District Rule 4320 requirement stated in Table 1, Category E, that requires units limited by the PTO to an annual heat input > 1.8 billion Btu/yr but ≤ 30 billion Btu/yr to emit no greater than 9 ppmv or 0.011 lb/MMBtu. Therefore, no adjustment is necessary.

F. Actual Emissions Reductions (AER's):

The AER's summarized from Section V.D. are presented in the tables below:

Total Actual Emission Reductions (AER)				
Pollutant	1st Qtr. AER (lb/qtr)	2nd Qtr. AER (lb/qtr)	3rd Qtr. AER (lb/qtr)	4th Qtr. AER (lb/qtr)
NO _x	14	14	13	17

G. Air Quality Improvement Deduction

In accordance with District Rule 2201, Sections 3.6 and 4.12.1, prior to banking, all AER's shall be discounted by 10 percent (10%) for Air Quality Improvement Deduction (AQID). The AQID for the AER's associated with this project are shown in the table below:

Air Quality Improvement Deduction (AQID)				
Pollutant	1st Qtr. AQID (lb/qtr)	2nd Qtr. AQID (lb/qtr)	3rd Qtr. AQID (lb/qtr)	4th Qtr. AQID (lb/qtr)
NO _x	1.4	1.4	1.3	1.7

H. Bankable ERC's

The bankable emission reduction credits (ERC's) are determined by subtraction of the AQID's from the AER's and are summarized in the following table.

Bankable Emissions Reductions Credits (ERC's)				
Pollutant	1st Qtr. ERC's (lb/qtr)	2nd Qtr. ERC's (lb/qtr)	3rd Qtr. ERC's (lb/qtr)	4th Qtr. ERC's (lb/qtr)
NO_x	13	13	12	15

VI. Compliance:

To comply with the definition of Actual Emissions Reductions (Rule 2201, Section 3.2.1 and Rule 2301, Sections 3.6 and 4.2.1), the reductions must be:

A. Real

The emissions reductions were generated by the shutdown of a 12.6 MMBtu/hr Hurst Boiler, permit unit C-3275-1. The permit for this unit has been surrendered to the District. The emissions reductions were calculated based on actual historic natural gas usage records submitted by the applicant. The facility has installed a new larger boiler (permit unit 3-1) which will potentially produce the steam which was originally produced by permit unit 1-3. However, the new boiler is a fully offset unit. Therefore, the allowed reductions are real.

B. Enforceable

The PTO for the boiler has been surrendered to the District. Operation of any of the equipment without a valid permit would subject the permittee to enforcement actions. Therefore, the reductions are enforceable.

C. Quantifiable

The reductions are quantifiable since they were calculated from historic natural gas usage data, the NO_x emissions limit required by District Rule 4320, and methods according to District Rule 2201.

D. Permanent

The boiler has been shutdown, removed from the facility, and PTO has been surrendered. Therefore, the reductions are permanent.

E. Surplus

To be considered surplus, Actual Emission Reductions shall be in excess, at the time the application for an Emission Reduction Credit or an Authority to Construct authorizing such reductions is deemed complete, of any emissions reduction which:

- **Is required or encumbered by any laws, rules, regulations, agreements, orders, or**

No laws, rules, regulations, agreements or orders were responsible for the surrendering the facility's permits or their subsequent application for Emission Reduction Credits (ERC's).

- **Is attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or**

Currently there are no control measures noticed for workshop, or proposed or contained in a State Implementation Plan that require the reduction of the emissions at this facility.

- **Is proposed in the APCO's adopted air quality plan pursuant to the California Clean Air Act.**

The shutdown of the boiler is not proposed in the APCO's adopted air quality plan.

No other proposed rule mandates additional reductions, therefore all calculated bankable emissions reduction are considered surplus.

F. Not used for the approval of an Authority to Construct or as offsets

The emission reduction credits generated by the shutdown of the boiler was not used for the approval of any Authority to Construct or as offsets.

G. Timely submittal

Section 5.5 of Rule 2301 – Emissions Reduction Credit Banking (12/17/92) states that ERC certificate applications for reductions shall be submitted within 180 days after the emission reduction occurs. The ERC application was received on February 15, 2011. The boiler was dismantled and removed from its location at the end of August 2012, and the determination was made at that time that the boiler would no longer operate. Therefore, the application was submitted in a timely fashion.

VII. Recommendation:

Pending a successful Public Noticing period, issue Emission Reduction Credit certificates C-1209-2 (NOx) to San Joaquin Valley Concentrates in accordance with the amounts specified on the draft ERC certificates in Attachment G.

Attachments:

- Attachment A: Surrendered PTO C-3275-1-3
- Attachment B: ERC Application
- Attachment C: Monthly/Yearly Hurst Boiler Gas Usage
- Attachment D: Draft ERC Certificates

Attachment A

Surrendered PTO
C-3275-1-3

INSPECTION

EXPIRATION DATE: 02/28/2014

LEGAL OWNER OR OPERATOR: SAN JOAQUIN VALLEY CONCENTRATES
MAILING ADDRESS: 5610 E OLIVE AVE
 FRESNO, CA 93727

LOCATION: 5631 E OLIVE AVE
 FRESNO, CA 93727

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:

12.6 MMBTU/HR HURST MODEL S4-X-300-250 SERIES 400 NATURAL GAS-FIRED BOILER WITH LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR)

WORKSHEET

CONDITIONS

1. {1407} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. {2964} The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
3. {2965} 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]
4. {2967} Maximum annual heat input of the unit shall not exceed 30 billion Btu per calendar year. [District Rules 2201, 4305 and 4306]
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 30 ppmvd NOx @ 3% O2 or 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.0728 lb-CO/MMBtu, or 0.0028 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306]
6. {2935} 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]
7. {2936} If either the NOx or CO concentrations corrected to 3% O2, 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]
8. {2937} 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]
9. {2938} The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (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]

10. {2972} 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]
11. {3466} Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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]
12. {2976} The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306]
13. {109} 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]
14. {2977} 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 and 4306]
15. {2978} CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306]
16. {2979} Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306]
17. {2980} 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]
18. {110} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
19. {2981} Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306]
20. {2983} 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]

Attachment B

ERC Application

RECEIVED
FEB 15 2013

San Joaquin Valley Air Pollution Control District

Application for

Permits Services
SJVAPCD

EMISSION REDUCTION CREDIT (ERC)

CONSOLIDATION OF ERC CERTIFICATES

1. ERC TO BE ISSUED TO: Facility ID: C-3275
San Joaquin Valley Concentrates (SJVC)

2. MAILING ADDRESS: Street/P.O. Box: 5631 E. Olive Avenue
City: Fresno State: Ca Zip Code: 93727

3. LOCATION OF REDUCTION:
Street: Same location as mailing address
City: _____
/4 SECTION TOWNSHIP RANGE

4. DATE OF REDUCTION:
August 2012

5. PERMIT NO(S): C-3275-1 Decommission of Hurst Boiler EXISTING ERC NO(S):

6. METHOD RESULTING IN EMISSION REDUCTION:
 SHUTDOWN RETROFIT PROCESS CHANGE OTHER

DESCRIPTION:
C-3275-1 Decommission of Hurst Boiler. Please see historical gas usage of Hurst boiler from 2009-2012 to calculate the ERCs.
Request review of ERC calculations for NOx to be based on 30 ppmv for NOx as boiler was taken out of service prior to compliance deadline of 1/1/14 to lower emissions for large boilers capped at 30 billion BTU/year.
Gallo kindly requests to review the ERC calculations prior to the certificates being issued. Please email Kim Burns at kim.burns@ejgallo.com when completed.
Thank you.

(Use additional sheets if necessary)

7. REQUESTED ERCs (In Pounds Per Calendar Quarter) – Request Credits for all Criteria Pollutants and GHG

	VOC	NOx	CO	PM10	SOx	OTHER
1ST QUARTER						
2ND QUARTER						
3RD QUARTER						
4TH QUARTER						

8. SIGNATURE OF APPLICANT: TYPE OR PRINT TITLE OF APPLICANT: Mr. Joe Rossi, Vice President
 MR. JOE ROSSI

9. TYPE OR PRINT NAME OF APPLICANT: Mr. Joe Rossi	DATE: 02/12/13	TELEPHONE NO: 559-458-2546
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FOR APCD USE ONLY:

RECEIVED FEB 15 2013 FINANCE SIVUAPCD	FILING FEE RECEIVED: \$ <u>759,00</u> C# <u>1557504</u> DATE PAID: <u>1/8/13 CM</u> PROJECT NO.: <u>C-1130355</u> FACILITY ID.: <u>C-3275</u>
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Attachment C

Monthly/Yearly Hurst Boiler Gas Usage

MONTHLY/YEARLY HURST BOILER GAS USAGE - 2012

Month	Meter Reading at Month End (SCF)	Meter Reading from End of Prior Month (SCF)	Gas Usage (SCF) x 1000	Gas Usage (in billion BTU's) * 942	Gas Usage to Date (in billion BTU's)	Remaining Available Gas Usage for Year (in billion BTU's) ^{#1}
Jan	190,782	188,347	2,435,000	2.2889	2.289	27.711
Feb	192,112	190,782	1,330,000	1.2502	3.539	26.461
Mar	193,301	192,112	1,189,000	1.1177	4.657	25.343
Apr	194,945	193,301	1,644,000	1.5454	6.202	23.798
May	195,847	194,945	902,000	0.8479	7.050	22.950
Jun	197,273	195,847	1,426,000	1.3404	8.390	21.610
Jul	197,908	197,273	635,000	0.5969	8.987	21.013
Aug	removed	197,908	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Sep	removed	removed	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Oct	removed	removed	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Nov	removed	removed	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Dec	removed	removed			#VALUE!	#VALUE!

MONTHLY/YEARLY HURST BOILER GAS USAGE - 2011

Month	Meter Reading at Month End (SCF)	Meter Reading from End of Prior Month (SCF)	Gas Usage (SCF) x 1000	Gas Usage (in billion BTU's) * 942	Gas Usage to Date (in billion BTU's)	Remaining Available Gas Usage for Year (in billion BTU's) ^{#1}
Jan	174,749	173,735	1,014,000	0.9532	0.953	29.047
Feb	175,591	174,749	842,000	0.7915	1.745	28.255
Mar	176,862	175,591	1,271,000	1.1947	2.939	27.061
Apr	178,055	176,862	1,193,000	1.1214	4.061	25.939
May	179,660	178,055	1,605,000	1.5087	5.570	24.431
Jun	180,984	179,660	1,324,000	1.2446	6.814	23.186
Jul	182,224	180,984	1,240,000	1.1656	7.980	22.020
Aug	182,936	182,224	712,000	0.6693	8.649	21.351
Sep	184,883	182,936	1,947,000	1.8302	10.479	19.521
Oct	187,179	184,883	2,296,000	2.1582	12.637	17.363
Nov	188,347	187,179	1,168,000	1.0979	13.735	16.265
Dec	189,134	188,347	787,000	0.7398	14.475	15.525
			15,399	MMBTU		

MONTHLY/YEARLY HURST BOILER GAS USAGE - 2010

Month	Meter Reading at Month End (SCF)	Meter Reading from End of Prior Month (SCF)	Gas Usage (SCF) x 1000	Gas Usage (in billion BTU's) * 942	Gas Usage to Date (in billion BTU's)	Remaining Available Gas Usage for Year (in billion BTU's)
Jan	156,757	155,312	1,445,000	1.3583	1.358	28.642
Feb	157,823	156,757	1,066,000	1.0020	2.360	27.640
Mar	159,533	157,823	1,710,000	1.6074	3.968	26.032
Apr	160,865	159,533	1,332,000	1.2521	5.220	24.780
May	161,884	160,865	1,019,000	0.9579	6.178	23.822
Jun	164,939	161,884	3,055,000	2.8717	9.049	20.951
Jul	165,925	164,939	986,000	0.9268	9.976	20.024
Aug	167,437	165,925	1,512,000	1.4213	11.398	18.603
Sep	168,423	167,437	986,000	0.9268	12.324	17.676
Oct	170,493	168,423	2,070,000	1.9458	14.270	15.730
Nov	172,206	170,493	1,713,000	1.6102	15.880	14.120
Dec	173,735	172,206	1,529,000	1.4373	17.318	12.682
			18,423	MMBTU		

MONTHLY/YEARLY HURST BOILER GAS USAGE - 2009

Month	Meter Reading at Month End (SCF)	Meter Reading from End of Prior Month (SCF)	Gas Usage (SCF) x 1000	Gas Usage (in billion BTU's) * 942	Gas Usage to Date (in billion BTU's)	Remaining Available Gas Usage for Year (in billion BTU's)
Jan	141,737	140,862	875,000	0.8225	0.823	29.178
Feb	142,656	141,737	919,000	0.8639	1.686	28.314
Mar	143,736	142,656	1,080,000	1.0152	2.702	27.298
Apr	144,695	143,736	959,000	0.9015	3.603	26.397
May	145,273	144,695	578,000	0.5433	4.146	25.854
Jun	146,085	145,273	812,000	0.7633	4.910	25.090
Jul	146,617	146,085	532,000	0.5001	5.410	24.590
Aug	148,397	146,617	1,780,000	1.6732	7.083	22.917
Sep	150,251	148,397	1,854,000	1.7428	8.826	21.174
Oct	152,688	150,251	2,437,000	2.2908	11.116	18.884
Nov	154,183	152,688	1,495,000	1.4053	12.522	17.478
Dec	155,312	154,183	1,129,000	1.0613	13.583	16.417
			14,450	MMBTU		

Attachment D

Draft ERC Certificates

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate
C-1209-2

ISSUED TO: SAN JOAQUIN VALLEY CONCENTRATES
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 5631 E OLIVE AVE
FRESNO, CA 93727

For NOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
13 lbs	13 lbs	12 lbs	15 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

12.6 MMBTU/HR HURST MODEL S4-X-300-250 SERIES 400 NATURAL GAS-FIRED BOILER WITH LOW-NOX BURNER AND INDUCED FLUE GAS RECIRCULATION (FGR)

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services