



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

JUN 20 2014

Mr. Kevin Rebelo
Morning Star Packing Company
13448 S Volta Rd
Los Banos, CA 93635

**Re: Final - Authority to Construct / COC (Significant Mod)
District Facility # N-1326
Project # N-1133785**

Dear Mr. Rebelo:

The Air Pollution Control Officer has issued an Authority to Construct (ATC N-1326-13-2) with a Certificate of Conformity to Morning Star Packing Company at 13348 S Volta Rd in Los Banos, CA. This project is for the modification of an 8.4 MMBtu/hr boiler to replace the existing low-NOx burner with an ultra-low NOx burner and to remove the current annual fuel heat input limit such that the boiler may be operated full-time. Enclosed are the an Authority 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 April 18, 2014. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on April 15, 2014. 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.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4880 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

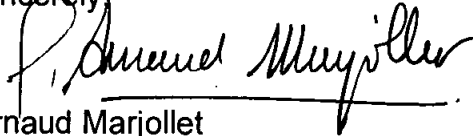
Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

Mr. Kevin Rebelo
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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,

A handwritten signature in black ink, appearing to read "Arnaud Marjollet", written over a horizontal line.

Arnaud Marjollet
Director of Permit Services

Enclosures

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



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1326-13-2

ISSUANCE DATE: 05/27/2014

LEGAL OWNER OR OPERATOR: MORNING STAR PACKING COMPANY
MAILING ADDRESS: 13448 S VOLTA RD
LOS BANOS, CA 93635

LOCATION: 13448 S VOLTA RD
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

MODIFICATION OF 8.4 MMBTU/HR HURST MODEL #SA-G-200-200 NATURAL GAS-FIRED BOILER WITH AN INDUSTRIAL COMBUSTION MODEL #LNDG-1455-20 LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR); MODIFICATION TO REPLACE THE EXISTING BURNER WITH A WEBSTER HDRMB ULTRA-LOW NOX BURNER AND TO REMOVE THE 9 BILLION BTU/YEAR FUEL USAGE RESTRICTION FROM THE PERMIT SUCH THAT THE BOILER MAY OPERATE FULL-TIME

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. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

N-1326-13-2; 05/27/2014 8:34AM - HALADERJ... Joint Inspection NOT Required

7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
8. The boiler shall only be fired on PUC-quality natural gas. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
9. The emissions from the boiler shall not exceed any of the following limits when fired on natural gas fuel: 9 ppmvd NO_x @ 3% O₂ (equivalent to 0.011 lb-NO_x/MMBtu), 0.00285 lb-SO_x/MMBtu, 0.005 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ (equivalent to 0.037 lb-CO/MMBtu), and 2 ppmvd VOC @ 3% O₂ (equivalent to 0.001 lb-VOC/MMBtu). [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
10. The combined NO_x emissions from the boilers operating under permits to operate (PTOs) N-1326-1, -2, -3, -8, -11, -12, and -13 shall not exceed 33,333 pounds per year on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Source testing to measure NO_x, CO, and VOC emissions from the boiler shall be conducted within 60 days of initial startup. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
12. Source testing to measure NO_x and CO emissions from the boiler shall be conducted at least once every 12 months. After demonstrating compliance on two 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 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
13. NO_x 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, 4320, and 4351] Federally Enforceable Through Title V Permit
14. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
15. VOC emissions for source test purposes shall be determined using EPA Method 18 or EPA Method 25. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
17. Stack gas velocities shall be determined using EPA Method 2 or 19. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
18. Stack gas moisture content shall be determined using EPA Method 4. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
25. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rules 4305 and 4306 and as approved by the District. The normal range/level shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
26. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
27. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
29. When the 36-month source testing frequency is in effect for the boiler, the owner/operator shall tune the boiler at least twice each calendar year. The boiler tuning shall be performed within four to eight months of the previous bi-annual tuning date. All equipment tuning shall be performed by a technician that is qualified, to the satisfaction of the APCO. Tuning shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). Permittee shall keep records of each calendar date that the boiler equipment tuning is performed. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
30. Permittee shall determine the natural gas fuel sulfur content annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
31. Records of the cumulative NOx emissions determined on a 12-month rolling basis from the boilers operating under PTOs N-1326-1, -2, -3, -8, -11, -12, and -13 shall be updated daily. [District Rule 2201] Federally Enforceable Through Title V Permit
32. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit