San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

JUL 15 2015

Dave Waggoner
Ingomar Packing Company
P. O. Box 1448
Los Banos, CA 93635

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: N-1276
Project Number: N-1151370

Dear Mr. Waggoner:

Enclosed for your review and comment is the District's analysis of Ingomar Packing Company's application for Authority to Construct permits for modification to increase annual fuel usage on bolier N-1276-15-4 and reduce annual fuel usage on boiler N-1276-3-14, at 9950 S. Ingomar Grade, Los Banos, CA.

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 and 45-day EPA notice comment periods, the District intends to issue the Authority to Construct permits. 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. Rupi Gill of Permit Services at (209) 557-6458.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:rg

Enclosures

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

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San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Boiler Modifications

Facility Name:	Ingomar Packing	Date:	July 2, 2015
Mailing Address:	P.O. Box 1448 Los Banos, CA 93635	Engineer:	Rupi Gill
		Lead Engineer:	James Harader
Contact Person:	Dave Waggoner		
Telephone:	209-826-9494		
Fax:	209-854-9494		
E-Mail:	David.waggoner@ingomar.com		
Application #(s):	N-1276-3-15 & N-1276-15-5		
Project #:	N-1151370		
Deemed Complete:	May 7, 2015		

I. Proposal

The primary business of Ingomar Packing is processing of agriculture products. Ingomar has submitted Authority to Construct (ATC) applications for the following:

N-1276-3-15:

Modification of 156 MMBTU/HR natural gas fired Nebraska boiler to reduce the annual heat input from 1,063,560 MMBtu/yr to 1,023,560 MMBtu/yr.

N-1276-15-5:

Modification of 98 MMBtu/hr natural gas Nebraska boiler to increase annual heat input from 200,000 MMBtu/yr to 240,000 MMBtu/yr

The proposed project will have no net increase in the permitted facility-wide natural gas usage of 19,600 Btu/day combined for boilers N-1276-1, -2, -3, -8, -9, -15, and -18.

Ingomar received their Title V Permit on May 29, 2013. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Ingomar must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4305	Boilers, Steam Generators and Process Heaters – Phase II (8/21/03)
Rule 4306	Boilers, Steam Generators and Process Heaters – Phase III (3/17/05)
Rule 4320	Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
Rule 4351	Boilers, Steam Generators and Process Heaters – Phase 1 (08/21/03)
Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The facility is located at 9950 S. Ingomar Grade Los Banos, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

The boilers burn natural gas for the purpose of producing steam that is used in the various operations to process agriculture products at the plant.

V. Equipment Listing

No change to the equipment is being proposed hence pre-project and post-project equipment description is same.

N-1276-3-15:

156 MMBTU/HR NEBRASKA MODEL N25-T-84 BOILER WITH A TODD RMB ULTRA-LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM

N-1276-15-5:

98 MMBTU/HR NATURAL GAS-FIRED NEBRASKA MODEL NS-F/S 68 BOILER EQUIPPED WITH A TODD VARI-FLAME MODEL #V8151G0XXX LOW NOX BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTACK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION

VI. Emission Control Technology Evaluation

There will be no changes or additions to the emission control systems, therefore, a control technology evaluation is not necessary.

VII. General Calculations

A. Assumptions

- PM2.5 emissions are assumed to be equal to PM10 emissions.
- Each boiler can operate 24 hours in any one day.

B. Emission Factors

The pre-modification emission factors are from the current PTO. No changes are proposed hence post-project emission factors will be same as the pre-project emission factors.

Pollutant	Emission Factors (EF) – lb/MMBtu	
	N-1276-3-15[1]	N-1276-15-15[2]
NOx	0.008	0.0062
SOx	0.00285	0.00285
PM10	0.0024	0.0076
CO	0.074	0.037
VOC	0.0055	0.0055
Ammonia	-	10 ppmvd @ 3% O_2

[1] NOx 7 ppmvd & CO 100 ppmvd @ 3% O_2
[2] NOx 5 ppmvd & CO 50 ppmvd @ 3% O_2

C. Calculations

1. Pre-Project Potential to Emit (PE1)

N-1276-3-15:

	Pre-Project Daily PE			
Pollutant	Rating (MMBtu/hr)	Hour/day	EF (lbs/MMBtu)	PE1 (lbs/day)
NOx	156	24	0.008	30.0
SOx	156	24	0.00285	10.7
PM10	156	24	0.0024	8.9
CO	156	24	0.074	277.0
VOC	156	24	0.0055	20.6

	Pre-Project Annual PE		
Pollutant	Rating (MMBtu/yr)	EF (lbs/MMBtu)	Annual PE1 (lbs/yr)
NOx	1,063,560	0.008	8508
SOx	1,063,560	0.00285	3031
PM10	1,063,560	0.0024	2553
CO	1,063,560	0.074	78,703
VOC	1,063,560	0.0055	5850

N-1276-15-5:

	Pre-Project Daily PE			
Pollutant	Rating (MMBtu/hr)	Hour/day	EF (lbs/MMBtu)	PE1 (lbs/day)
NOx	98	24	0.0062	14.6
SOx	98	24	0.00285	6.7
PM10	98	24	0.0076	17.9
CO	98	24	0.037	87.0
VOC	98	24	0.0055	12.9

The daily NH_3 emissions will be calculated utilizing the following equation:

$PE = (ppm)(MW)(2.63 \times 10^{-9})(ff)(C)(20.9/(20.9 - \%O_2))$ lb/day

Where: ppm is the emission concentration
NH_3 = 10 ppmvd@ 3% O_2
MW is the molecular wt. of the pollutant
NH_3 = 17
2.63×10^{-9} is a constant
ff is the f-factor of natural gas (8,578 dscf/MMBtu @ 60 degrees F)

C is the fuel burning capacity of the equipment (2,352 MMBtu/day)
% O_2 is the oxygen content to which the stack exhaust is corrected (3%)

PE_{NH3} = (10)(17)(2.63 X 10^{-9})(8,578)(2,352)(20.9/(20.9 – 3)) lb/day
= 10.5 lb/day

Pre-Project Annual PE[3]			
Pollutant	Rating (MMBtu/yr)	EF (lbs/MMBtu)	PE1 (lbs/yr)
NOx	200,000	0.0062	1240
SOx	200,000	0.00285	570
PM10	200,000	0.0076	1520
CO	200,000	0.037	7400
VOC	200,000	0.0055	1100
NH_3	200,000	0.0045	900

2. Post Project Potential to Emit (PE2)

N-1276-3-15 & N-1276-15-5 Daily PE2:

Applicant is not proposing any change in daily fuel usage, therefore Daily PE2 = Daily PE1 above.

N-1276-3-15 Annual PE2:

Post-Project Annual PE			
Pollutant	Rating (MMBtu/yr)	EF (lbs/MMBtu)	Annual PE2 (lbs/yr)
NOx	1,023,560	0.008	8188
SOx	1,023,560	0.00285	2917
PM10	1,023,560	0.0024	2457
CO	1,023,560	0.074	75,743
VOC	1,023,560	0.0055	5630

N-1276-15-5 Annual PE2:

Post-Project Annual PE[3]			
Pollutant	Rating (MMBtu/yr)	EF (lbs/MMBtu)	PE2 (lbs/yr)
NOx	240,000	0.0062	1488
SOx	240,000	0.00285	684
PM10	240,000	0.0076	1824
CO	240,000	0.037	8880
VOC	240,000	0.0055	1320
NH_3	240,000	0.0045	1080

[3] NH_3 (EF lbs/MMBtu) = 10.5 lbs/day ÷ 2352 MMBtu/day = 0.0045 lbs/MMBtu

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site. The SSPE1 is from the most recent project #N-1143218.

	SSPE1 (lb/year)				
	NOx	CO	VOC	SOx	PM10
N-1276-1-13	33,709	167,538	16,198	15,897	23,372
N-1276-2-14					
N-1276-3-14					
N-1276-8-7					
N-1276-9-7					
N-1276-15-4					
N-1276-18-2					
N-1276-19-0	0		0	0	438
N-1276-20-0	138		20	0	8
Total w/o ERC	33,847	167,538	16,218	15,897	23,818
ERC	0	0	0	0	0
Total	33,847	167,538	16,218	15,897	23,818

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site. The SSPE2 can be calculated by adding the PE2 from all units with valid ATCs or PTOs and the sum of the ERCs that have been banked at the source and which have not been used on-site ($Total_{ERC}$). The SSPE2 is calculated in Appendix E and presented in the following table.

	SSPE2 (lb/year)				
	NO_X	CO	VOC	SOx	PM10
SSPE2	33,775	167,538	16,218	15,897	24,026

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)

- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)						
	NO_X	SO_X	PM_{10}	$PM_{2.5}$	CO	VOC
SSPE1	33,847	15,897	23,818	23,818	167,538	16,218
SSPE2	33,775	15,897	24,026	24,026	167,538	16,218
Major Source Threshold	20,000	140,000	140,000	200,000	200,000	20,000
Major Source?	Yes	No	No	No	No	No

Note: PM2.5 assumed to be equal to PM10

This source is an existing Major Source for NOx emissions and will remain a Major Source for NOx. No change in other pollutants are proposed or expected as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 100 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Estimated Facility PE before Project Increase	16.9	8.1	7.9	83.7	11.9	11.9
PSD Major Source Thresholds	100	100	100	100	100	100
PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown above, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,

- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

NOx:

The facility is a Major Source for NOx. Section 3.8.1.4 of Rule 2201 states that for Major Source pollutants, the Baseline Emissions are equal to the premodification potential to emit if all units in the SLC are Clean Emission Units. The two boilers are part of an existing specific limiting condition (SLC) (fuel usage limit of 19,600 Btu/day), therefore, a Clean Emission Unit determination is required for each unit in the SLC.

BACT guideline 1.1.2 (Boilers > 20 MMBtu/hr), which applied to these units was rescinded and is being updated. In the interim, the District is considering the Achieved-in-Practice NOx BACT level for boilers rated at over 20 MMBtu/hr to be 7 ppmvd @ 3% O_2.

Permit	Description	Achieved-in-Practice BACT Level	Achieved-in-Practice BACT Met
N-1276-1-13	Boilers	NOx emissions of 7 ppmvd @ 3% O_2 or less	Yes, condition 5
N-1276-2-14			Yes, condition 6
N-1276-3-14			Yes, condition 6
N-1276-8-7			Yes, condition 4
N-1276-9-7			Yes, condition 5
N-1276-15-4			Yes, condition 5
N-1276-18-2			Yes, condition 8

All of the NOx emitting boilers included in the SLC are Clean Emission Units for NOx, therefore, the Baseline Emissions for NOx are equal to the SLC.

BE_{NOx} = 33,709 lb/yr

CO, VOC, SOx and PM10:

The purpose of determining Baseline Emissions is for use in quantity-of-offsets calculations. The SSPE2 of each of these pollutants is less than its offset threshold, therefore quantity-of-offset calculations are not required. Since quantity-of-offsets calculations are not required for these pollutants, it is not necessary to determine their Baseline Emissions.

7. SB 288 Major Modification

This facility is a Major Source for only NOx, therefore, an SB-288 Major Modification determination is required for only NOx.

An SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

The first step is to determine whether the project emissions are greater than the SB 288 threshold. If the project emissions are less than the SB 288 threshold, the project cannot trigger an SB 288 modification. The project's PE2 of NOx is compared to the SB 288 Major Modification Threshold in the following table in order to determine if an SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification
NO_x	9,676	50,000	No

Since the SB 288 Major Modification threshold for NOx is not surpassed with this project, this project is not an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

N-1276-3-15

The proposed modification will not allow this boiler to operate at a higher utilization rate.

Therefore, NEI (NOx) = 0

N-1276-15-5:

The proposed modification will allow this boiler to operate at a higher utilization rate.

For existing emissions units, the increase in emissions is calculated as follows.

Emission Increase = PAE – BAE - UBC

Where: PAE = Projected Actual Emissions, and
BAE = Baseline Actual Emissions
UBC = Unused baseline capacity

If there is no increase in design capacity or potential to emit, the PAE is equal to the annual emission rate at which the unit is projected to emit in any one year, selected by the operator, within 5 years after the unit resumes normal operation (10 years for existing units with an increase in design capacity or potential to emit). If detailed PAE are not provided, the PAE is equal to the PE2 for each permit unit.

PAE = $PE2_{N\text{-}1276\text{-}15}$ =1,488 lb-NOx/yr

The BAE is calculated based on historical emissions and operating records for any 24 month period, selected by the operator, within the previous 10 year period (5 years for electric utility steam generating units). The BAE must be adjusted to exclude any non-compliant operation emissions and emissions that are no longer allowed due to lower applicable emission limits that were in effect when this application was deemed complete. BAE are determined using the emissions inventory data for the two years 2011 and 2012. The average of these two year data is used to estimate the BAE for this unit.

BAE = $BAE_{N\text{-}1276\text{-}15}$ = 630[4] lb-NOx/yr

UBC: UBC is the portion of PAE that the emission units could have accommodated during the baseline period. The applicant has proposed to increase heat input rate to the unit. Therefore,

UBC = 0 lb-NOx/yr

Emissions Increase = PAE – BAE – UBC
= 1,488 lb-NOx/yr – 630 lb-NOx/yr –0 lb-NOx/yr
= 858 lb-NOx/yr

Pollutant	Threshold (lb/yr)
NOx	0

As can be seen, the NEI of NOx is in excess of its Federal Major Modification threshold. Therefore, this permitting action is a Federal Major Modification.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)

[4]The emissions inventory data is deemed confidential; therefore, detailed calculations are not presented here.

- CO
- PM
- PM10

I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project is a new major source subject to PSD requirements.

The facility or the equipment evaluated under this project is listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 100 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	CO	VOC	SOx	PM	PM10
Total PE from New and Modified Units	4.8	42.3	3.5	1.8	2.1	2.1
PSD Major Source threshold	100	100	100	100	100	100
New PSD Major Source?	No	No	No	No	No	No

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix F.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,

b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

AIPE = PE2 – HAPE

Where,
AIPE = Adjusted Increase in Permitted Emissions, (lb/day)
PE2 = Post-Project Potential to Emit, (lb/day)
HAPE = Historically Adjusted Potential to Emit, (lb/day)

HAPE = PE1 x (EF2/EF1)

Where,
PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)
EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1
EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

AIPE = PE2 – (PE1 * (EF2 / EF1))

N-1276-3-15:

As shown in sections VII.C.1 and VII.C.2 of this document, there will not be a change in the potential to emit of any of the pollutants and as shown in section VII.B,

there will not be a change in the emission factor for any of the pollutants. Therefore, AIPE is zero for all the pollutants and BACT is not required.

N-1276-15-5:

The applicant is proposing to increase the annual utilization capacity of the boiler that will result in increase in number of days the boiler can operate. Hence the PE1 will be zero for the additional days that the boiler will operate after the project and AIPE will be equal to PE2.

Pollutant	AIPE (lbs/day)
NOx	14.6
SOx	6.7
PM10	17.9
CO	87.0
VOC	12.9
NH3	10.5

Per section VII.C.2 of this document, PE2 is greater than 2.0 lb/day for NO_x, SO_x, PM_{10}, CO, VOC and NH_3. Total CO emissions from this facility are less than 200,000 lb/yr. The District practice is not to consider BACT on emission control equipment; therefore, BACT for NH_3 emissions will not be evaluated. Thus, BACT is triggered for NOx, SOx, PM_{10}, and VOC emissions.

The District conducts project-specific analyses for boilers similar to the ones in this project. BACT for units greater than 20 MMBtu/hr operating in a steady-state mode is as follows:

NO_x: 7.0 ppmvd @ 3% O_2 (or less) – Achieved-in-practice
5.0 ppmvd @ 3% O_2 (or less) – Technologically feasible

SO_x, PM_{10}, VOC: Use of PUC quality natural gas

The applicant's proposal to comply with 5.0 ppmvd NOx @ 3% O_2 (or less) with SCR system and use of PUC quality natural gas would satisfy the BACT for NO_x, SO_x, PM_{10}, and VOC emissions. Please refer to Appendix C of this document for Top-Down BACT Analysis.

d. SB 288/Federal Major Modification

As shown in section VII.C.7 and VII.C.8, the permitting action does not constitute an SB 288 modification for neither boiler and is a Federal Major Modification for NOx emissions for boiler N-1276-15-5 since it results in significant emissions increase. Therefore, BACT is required for NOx for N-1276-15-5.

1. BACT Guideline

BACT guideline 1.1.2 (Boilers > 20 MMBtu/hr), which applied to these units was rescinded and is being updated. In interim, the District conducts project-specific analyses for boilers similar to the ones in this project.

2. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached Top-Down BACT Analysis (see **Appendix C**), BACT has been satisfied with the following:

NO_x: 7.0 ppmvd @ 3% O_2 (or less) – Achieved-in-practice
5.0 ppmvd @ 3% O_2 (or less) – Technologically feasible

The applicant's proposal to continue to comply with 5.0 ppmvd NOx @ 3% O_2 (or less) with SCR system and use of PUC quality natural gas would satisfy the BACT for NO_x emissions for the federal major modification.

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
SSPE2	33,775	15,897	24,026	167,538	16,218
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	No	No	No

2. Quantity of Offsets Required

As discussed above, the facility is an existing Major Source for NOx and the SSPE2 is greater than the offset thresholds; therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for NOx is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (SSPE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE)

Pursuant to District Policy APR 1420, *NSR Calculations for Units with Specific Limiting Conditions (3/12/07)*, the quantity of ERCs for a project will be determined by comparing the post project PE, which is the SLC, to the pre project BE for the SLC.

Additionally, the policy states that if the SLC is for a pollutant exceeding the Major Source threshold and any single unit under the SLC is not a Highly-Utilized, Fully-Offset, or Clean Emissions Units, then the sum of the actual emissions from all units in SLC will be used to determine the pre project BE.

As established in this document, all NOx emitting boilers at this facility meet the District's determination of achieved-in-practice BACT (and are thus Clean Emission Units), therefore the pre project BE emissions are equal to the pre project PE emissions ($BE_{SLC} = PE1_{SLC}$).

Based on the information above, the emissions increase to be offset for this project should be calculated as follows:

Emissions Increase (lb/year) = $PE2_{SLC} - BE_{SLC}$

Where: $PE2_{SLC}$ = Post project emissions for the units in the SLC.

In this project, $PE2_{SLC}$ is less than $PE1_{SLC}$.

$BE_{SLC} = PE1_{SLC}$ = 33,709 lb-NOx/year

Therefore,

Emissions Increase (lb/year) = $PE2_{SLC} - BE_{SLC}$
= 33,637 lb-NOx/year – 33,709 lb-NOx/year
< 0 lb-NOx/year

Thus, no offsets are required.

C. Public Notification

1. Applicability

Public noticing is required for:
a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
c. Any project which results in the offset thresholds being surpassed, and/or
d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.
e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Sections VII.C.7 this project does not constitute an SB 288 Major Modification; therefore, public noticing for SB 288 purposes is not required.

As demonstrated in Sections VII.C.8, this project is an Federal Major Modification. Therefore, public noticing for Federal Major Modification purposes is required.

b. PE > 100 lb/day

Applications that include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO_X	33,847	33,775	20,000 lb/year	No
CO	167,538	167,538	200,000 lb/year	No
VOC	16,218	16,218	20,000 lb/year	No
SO_X	15,897	15,897	54,750 lb/year	No
PM_{10}	23,818	24,026	29,200 lb/year	No

As shown above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in an SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO_X	33,775	33,847	0	20,000 lb/year	No
CO	167,538	167,538	0	20,000 lb/year	No
VOC	16,218	16,218	0	20,000 lb/year	No
SOx	15,897	15,897	0	20,000 lb/year	No
PM10	24,026	23,818	208	20,000 lb/year	No

The NH3 emissions from the project are less than 20,000 lb/year.

As shown above, the SSIPEs for all pollutants are less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

2. Public Notice Action

As shown above, a public notification is required because the permitting action is a Federal Major Modification.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

N-1276-3-15:

NOx emissions shall not exceed 7 ppmvd @ 3% O_2 or 0.008 lb/MMBtu referenced as NO2.

CO emissions shall not exceed 100 ppmvd @ 3% O_2 or 0.074 lb/MMBtu.

VOC emissions shall not exceed 0.0055 lb/MMBtu.

SOx emissions shall not exceed 0.00285 lb/MMBtu.

PM10 emissions shall not exceed 0.0024 lb/MMBtu.

N-1276-15-4:

NOx emissions shall not exceed 5 ppmvd @ 3% O_2 or 0.0062 lb/MMBtu referenced as NO2.

CO emissions during shall not exceed 50 ppmvd @ 3% O_2 or 0.037 lb/MMBtu.

VOC emissions shall not exceed 0.0055 lb/MMBtu.

SOx emissions shall not exceed 0.00285 lb/MMBtu.

PM10 emissions shall not exceed 0.0076 lb/MMBtu.

Ammonia (NH3) emissions shall not exceed 10 ppmvd @ 3% O_2 over a 15 minute averaging period.

E. Compliance Assurance

1. Source Testing

Source testing is required by District Rule 4320 (Advanced Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5.0 MMBtu/hr) and the ATC's and PTO's will reflect those requirements.

2. Monitoring

Refer to section VIII (Rule 4320 Compliance and 40 CFR Part 60 Subpart Db Compliance) for discussions of monitoring requirements.

3. Recordkeeping

The facility-wide permit currently include, and will continue to include a daily facility-wide fuel usage limit. The records necessary to verify compliance with this limit will continue to be required.

Permits N-1276-3 and N-1276-15 will include annual heat input limits. The records necessary to verify compliance with those limits will be required.

Each unit is subject to the periodic emission monitoring requirements of Rule 4320 and as required by that rule, records of the periodic monitoring activities will be required.

4. Reporting

40 CFR Part 60 Subpart Db requires excess emission reporting. Refer to section VIII (40 CFR Part 60 Subpart Db Compliance) of this document for a discussion of reporting requirements.

F. Ambient Air Quality Analysis (AAQA)

An AAQA shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. The District's Technical Services Division conducted the required analysis. Refer to **Appendix D** of this document for the AAQA summary sheet.

The proposed location is in an attainment area for NO_X, CO, and SO_X. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for NO_X, CO, or SO_X.

The proposed location is in a non-attainment area for the state's PM_{10} as well as federal and state $PM_{2.5}$ thresholds. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for PM_{10} and $PM_{2.5}$.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This rule applies to Major Sources of air pollutants and to Major Air Toxics Sources. The facility is operating under a Title V permit and this permitting action is a Significant Modification. The applicant has proposed to receive the Authority to Construct permits with a Certificate of Conformity so the following conditions will be placed on the Authority to Construct permits.

{1830} 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 NSR Rule] Y

{1831} 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] Y

Rule 4001 New Source Performance Standards (NSPS)

40 CFR Part 60 Subpart Db

This rule applies to boilers that are rated at more than 100 MMBtu/hr. The boiler N-1276-3-15 currently under consideration is rated at 156 MMBtu/hr and is therefore a subject unit. Compliance with this rule was address during the processing of the applications for project N-1113823 (Title V Permit Renewal) and since the modification will consist solely of change in annual fuel usage a re-evaluation is not necessary.

40 CFR Part 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

This rule applies to Small Industrial-Commercial-Industrial Steam Generators between 10 MMBtu/hr and 100 MMBtu/hr (post-6/9/89 construction, modification or, reconstruction). Subpart Dc has standards for SO_X and PM_{10}. The boiler N-1276-15-5 is rated at 98 MMBtu/hr and is therefore subject to Subpart Dc requirements. Compliance with this rule was address during the processing of the applications for project N-1113823 (Title V Permit Renewal) and since the modification will consist solely of change in annual fuel usage a re-evaluation is not necessary.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR Part 63 Subpart DDDDD

Per section 63.7485, this rule applies to industrial, commercial and institutional boilers and process heaters that are located at major sources of HAP emissions. During the processing of the applications for project N-1113286, the facility was determined to be a non-major source of HAP emissions, therefore, this rule does not apply.

40 CFR Part 63 Subpart JJJJJJ

This subpart applies to boilers combusting solid fossil fuels, biomass, or liquid fuels located at an area source. The two boilers covered in this project only combust natural gas, therefore this rule does not apply.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). As the boilers are fired solely on natural gas, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility continued compliance is expected.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Appendix D**), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
N-1276-3-15 & N-1276-15-5	5.66E-09	No

The following condition will be listed on the ATC N-1276-15-5 to ensure compliance with the RMR:

1. {1898} 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]

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot. The units are fired solely on PUC quality natural gas, and due to low particulate matter emissions associated with the burning of this type of fuel, compliance is expected.

Rule 4304 Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters
Rule 4305 Boilers, Steam Generators and Process Heaters – Phase 2
Rule 4306 Boilers, Steam Generators and Process Heaters – Phase 3
Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators and Process heaters Greater Than 5.0 MMBtu/hr
Rule 4351 Boilers, Steam Generators and Process Heaters – Phase 1

Except for the change in annual fuel usage limits, the applicant is not proposing any equipment or control technology change. Compliance with these rules was addressed during the processing of the previous applications and the TV project N-1113823. Since this permitting action is solely to change annual fuel usage limits, a re-evaluation is not necessary.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has prepared or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

On December 17, 2009, the District's Governing Board adopted a policy, APR 2005, Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency, for addressing GHG emission impacts when the District is Lead Agency under CEQA and approved the District's guidance document for use by other agencies when addressing GHG impacts as lead agencies under CEQA. Under this policy, the District's determination of significance of project-specific GHG emissions is founded on the principal that projects with GHG emission reductions consistent with AB 32 emission reduction targets are considered to have a less than significant impact on global climate change. Consistent with District Policy 2005, projects complying with an approved GHG emission reduction plan or GHG mitigation program, which avoids or substantially reduces GHG emissions within the geographic area in which the project is located, would be determined to have a less than significant individual and cumulative impact for GHG emission.

The California Air Resources Board (ARB) adopted a Cap-and-Trade regulation as part one of the strategies identified for AB 32. This Cap-and-Trade regulation is a statewide plan, supported by a CEQA compliant environmental review document, aimed at reducing or mitigating GHG emissions from targeted industries. Facilities subject to the Cap-and-Trade regulation are subject to an industry-wide cap on overall GHG emissions. Any growth in emissions must be accounted for under that cap such that a corresponding and equivalent reduction in emissions must occur to allow any increase. Further, the cap decreases over time, resulting in an overall decrease in GHG emissions.

Under District policy APR 2025, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, the District finds that the Cap-and-Trade is a regulation plan approved by ARB, consistent with AB32 emission reduction targets, and supported by a CEQA compliant environmental review document. As such, consistent with District Policy 2005, projects complying project complying with Cap-and-Trade requirements are determined to have a less than significant individual and cumulative impact for GHG emissions.

The GHG emissions increases associated with this project result from the combustion of fossil fuel(s), other than jet fuel, delivered from suppliers subject to the Cap-and-Trade regulation. Therefore, as discussed above, consistent with District Policies APR 2005 and APR 2025, the District concludes that the GHG emissions increases associated with this project would have a less than significant individual and cumulative impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities),

and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATC N-1276-3-15 and N-1276-15-5 subject to the permit conditions on the attached draft ATCs in **Appendix A**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
N-1276-3-15	3020-02-H	156,000 kBtu/hr boiler	$1080.00
N-1276-15-5	3020-02-H	98,000 kBtu/hr boiler	$1080.00

Appendixes

A: Draft ATC
B: Current PTO(s)
C: BACT Analysis
D: HRA Summary
E: SSPE2 Calculations
F: Quarterly Net Emissions Change
G: Compliance Certification

APPENDIX A
Draft Authority to Construct Permits

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-1276-3-15

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY
MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:
MODIFICATION OF 156 MMBTU/HR NEBRASKA MODEL N25-T-84 BOILER WITH A TODD RMB ULTRA-LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM: REDUCE THE ANNUAL HEAT INPUT FROM 1,063,560 MMBTU/YR TO 1,023,560 MMBTU/YR

CONDITIONS

1. {1830} 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. {1831} 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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions from any combustion source shall not exceed 0.1 grains/dscf (calculated to 12% carbon dioxide). [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
5. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
7. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] 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

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Arnaud Marjollet, Director of Permit Services
N-1276-3-15 : Jul 6 2015 4:03PM -- GILLR : Joint Inspection NOT Required

8. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. A record of the cumulative annual facility-wide NOx emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. {1898} 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]
12. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
13. This unit shall be fired only on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
14. The fuel usage of this unit shall not exceed 1,023,560 MMBtu during any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
15. NOx emissions shall not exceed 7 ppmvd @ 3% O2 (referenced as NO2) or 0.008 lb/MMBtu. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
16. CO emissions shall not exceed 100 ppmvd @ 3% O2 or 0.074 lb/MMBtu. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
17. VOC emissions shall not exceed 0.0055 lb/MMBtu (referenced as methane). [District Rule 2201] Federally Enforceable Through Title V Permit
18. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. PM10 emissions shall not exceed 0.0024 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Source testing to determine compliance with the NOx and CO emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 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 months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. 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
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. 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] Federally Enforceable Through Title V Permit
25. 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

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CONDITIONS CONTINUE ON NEXT PAGE

26. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

27. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

28. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

29. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

30. 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 and 4320] Federally Enforceable Through Title V Permit

31. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 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 and 4320] Federally Enforceable Through Title V Permit

32. 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 and 4320] Federally Enforceable Through Title V Permit

33. 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 and 4320] Federally Enforceable Through Title V Permit

34. 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 and 4320] Federally Enforceable Through Title V Permit

35. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit

36. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit

37. The records necessary to show the required tune-ups were conducted shall be kept. [District Rule 4320] Federally Enforceable Through Title V Permit

38. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

39. A record of the annual fuel usage of this unit, on a rolling 12-month basis, shall be kept. The record shall be in MMBtu and shall be updated at least once during each calendar month that the unit operates. [District Rule 2201] Federally Enforceable Through Title V Permit

40. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit

41. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit

42. Permittee shall determine sulfur content of combusted gas 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

43. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

44. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [District Rule 4001] Federally Enforceable Through Title V Permit

45. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit

46. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit

47. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit

48. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit

49. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-1276-15-5 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY
MAILING ADDRESS: P O BOX 1448
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:
MODIFICATION OF 98 MMBTU/HR NATURAL GAS-FIRED NEBRASKA MODEL NS-F/S 68 BOILER EQUIPPED WITH A TODD VARI-FLAME MODEL #V8151G0XXX LOW NOX BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTACK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION: INCREASE ANNUAL HEAT INPUT FROM 200,000 MMBTU/YR TO 240,000 MMBTU/YR

CONDITIONS

1. {1830} 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. {1831} 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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions from any combustion source shall not exceed 0.1 grains/dscf (calculated to 12% carbon dioxide). [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
5. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
7. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] 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

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Arnaud Marjollet, Director of Permit Services

N-1276-15-5 Jul 7 2015 10:41AM -- GILLR : Joint Inspection NOT Required

8. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. A record of the cumulative annual facility-wide NOx emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
10. {1898} 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]
11. 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
12. The unit shall be fired only on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
13. The heat input into this unit shall not exceed 240,000 MMBtu during any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
15. NOx emissions shall not exceed 5 ppmvd @ 3% O2 or 0.0062 lb/MMBtu referenced as NO2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. CO emissions shall not exceed 50 ppmvd @ 3% O2 or 0.037 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Ammonia (NH3) emissions shall not exceed 10 ppmvd @ 3% O2 over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Source testing to determine compliance with the NOx, CO and ammonia emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 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 months. [District Rules 4305, 4306 and 4320]
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] Federally Enforceable Through Title V Permit
23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. 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] Federally Enforceable Through Title V Permit
25. For NOx and CO emission 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 that limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

26. 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

27. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

28. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

31. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit

32. The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Ammonia monitoring shall be conducted utilizing Dreager tubes or another District approved equivalent method. 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 it has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

33. Ammonia emission readings shall be taken at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

34. If the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the NH3 monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 and 4320] Federally Enforceable Through Title V Permit

35. NOx, CO, O2 and NH3 emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 readings, evenly spaced out over the 15 consecutive-minute period [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

36. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

37. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit

38. A record of the fuel usage of this unit, on a 12 month rolling total basis, shall be kept. The record shall be updated at least once every calendar month. [District Rule 2201] Federally Enforceable Through Title V Permit

39. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

40. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit

41. Permittee shall determine sulfur content of combusted gas 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

42. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

43. This unit is subject to the requirements of 40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Dc] Federally Enforceable Through Title V Permit

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APPENDIX B
Current PTOs

San Joaquin Valley
Air Pollution Control District

FACILITY: N-1276-0-3 **EXPIRATION DATE:** 09/30/2016

FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions from any combustion source shall not exceed 0.1 grains/dscf (calculated to 12% carbon dioxide). [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
3. The facility-wide fuel usage shall not exceed 19,600 MMBtu in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The facility-wide CO emissions shall not exceed 167,538 pounds during any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
5. A record of the daily facility-wide fuel usage, in Btu, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A record of the cumulative annual facility-wide CO emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
7. A record of the cumulative annual facility-wide NOx emissions shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
9. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
10. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
11. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

12. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
13. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
14. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
16. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
18. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
19. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
20. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
21. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
22. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
23. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
24. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

25. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit

26. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

27. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit

28. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

29. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

30. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit

31. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit

32. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit

33. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

34. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

35. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit

36. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit

37. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit

38. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

39. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit

40. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

41. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

42. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

43. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

44. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

45. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

46. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

47. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

48. On April 30, 2006, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1276-3-14 **EXPIRATION DATE:** 09/30/2016

EQUIPMENT DESCRIPTION:
156 MMBTU/HR NEBRASKA MODEL N25-T-84 BOILER WITH A TODD RMB ULTRA-LOW NOX BURNER AND AN INDUCED FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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]
3. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This unit shall be fired only on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
5. The fuel usage of this unit shall not exceed 1,063,560 MMBtu during any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
6. NOx emissions shall not exceed 7 ppmvd @ 3% O2 (referenced as NO2) or 0.008 lb/MMBtu. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
7. CO emissions shall not exceed 100 ppmvd @ 3% O2 or 0.074 lb/MMBtu. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
8. VOC emissions shall not exceed 0.0055 lb/MMBtu (referenced as methane). [District Rule 2201] Federally Enforceable Through Title V Permit
9. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 0.0024 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Source testing to determine compliance with the NOx and CO emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 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 months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. 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
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. 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] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. 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
17. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. 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 and 4320] Federally Enforceable Through Title V Permit
22. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 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 and 4320] Federally Enforceable Through Title V Permit
23. 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 and 4320] Federally Enforceable Through Title V Permit
24. 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 and 4320] Federally Enforceable Through Title V Permit
25. 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 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

26. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
27. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
28. The records necessary to show the required tune-ups were conducted shall be kept. [District Rule 4320] Federally Enforceable Through Title V Permit
29. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
30. A record of the annual fuel usage of this unit, on a rolling 12-month basis, shall be kept. The record shall be in MMBtu and shall be updated at least once during each calendar month that the unit operates. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
32. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit
33. Permittee shall determine sulfur content of combusted gas 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
34. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
35. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [District Rule 4001] Federally Enforceable Through Title V Permit
36. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
37. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
39. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
40. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1276-15-4 **EXPIRATION DATE:** 09/30/2016

EQUIPMENT DESCRIPTION:
98 MMBTU/HR NATURAL GAS-FIRED NEBRASKA MODEL NS-F/S 68 BOILER EQUIPPED WITH A TODD VARI-FLAME MODEL #V8151G0XXX LOW NOX BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A CRI CATASTACK SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The unit shall be fired only on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
3. The heat input into this unit shall not exceed 200,000 MMBtu during any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
5. NOx emissions shall not exceed 5 ppmvd @ 3% O2 or 0.0062 lb/MMBtu referenced as NO2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. CO emissions shall not exceed 50 ppmvd @ 3% O2 or 0.037 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. VOC emissions shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Ammonia (NH3) emissions shall not exceed 10 ppmvd @ 3% O2 over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Source testing to determine compliance with the NOx, CO and ammonia emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 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 months. [District Rules 4305, 4306 and 4320]
12. 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
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. 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] Federally Enforceable Through Title V Permit

15. For NOx and CO emission 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 that limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

16. 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

17. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]

20. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

21. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit

22. The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. Ammonia monitoring shall be conducted utilizing Dreager tubes or another District approved equivalent method. 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 it has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

23. Ammonia emission readings shall be taken at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

24. If the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the NH3 monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 and 4320] Federally Enforceable Through Title V Permit

25. NOx, CO, O2 and NH3 emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 readings, evenly spaced out over the 15 consecutive-minute period [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

26. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
28. A record of the fuel usage of this unit, on a 12 month rolling total basis, shall be kept. The record shall be updated at least once every calendar month. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
30. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit
31. Permittee shall determine sulfur content of combusted gas 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
32. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. This unit is subject to the requirements of 40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit

APPENDIX C
BACT Analysis

Top-Down BACT Analysis for NOx for N-1276-15-5

Step 1: Identify All Possible Control Technologies

The District considers the following NOx emissions limits:

Achieved-in-Practice:
7.0 ppmvd @ 3% O_2 (0.008 lb/MMBtu)

Technologically Feasible:
5.0 ppmvd @ 3% O_2 (0.0062 lb/MMBtu)

Alternate Basic Equipment:
None

Step 2: Eliminate Technologically Infeasible Options

All control options listed in step 1 are technologically feasible.

Step 3: Rank Remaining Control Technologies by Control Effectiveness

1. 5.0 ppmvd @ 3% O_2 (0.0062 lb/MMBtu) - Technologically Feasible
2. 7.0 ppmvd @ 3% O_2 (0.011 lb/MMBtu) - Achieved-in-Practice

Step 4: Cost Effectiveness Analysis

Option 1: 5.0 ppmvd @ 3% O_2 (0.0062 lb/MMBtu)
The applicant has proposed to emit 5.0 ppmvd NOx @ 3% O2 or less from this boiler; therefore, cost effectiveness analysis is not required.

Step 5: Select BACT
BACT requirement is to achieve 7.0 ppmvd NO_x @ 3% O_2 (or less) concentrations. However, the applicant has proposed to continue to achieve 5.0 ppmvd NOx @ 3% O_2 (or less).

Top-Down BACT Analysis for SOx, PM10 and VOC for N-1276-15-5

Step 1: Identify All Possible Control Technologies

The following techniques are considered to reduce SOx, PM_{10} or VOC emissions.

Achieved-in-Practice:
Use natural gas, or LPG fuel

Technologically Feasible:
None

Alternate Basic Equipment:
None

Step 2: Eliminate Technologically Infeasible Options

All control options listed in step 1 are technologically feasible.

Step 3: Rank Remaining Control Technologies by Control Effectiveness

1. use of natural gas or LPG fuel

Step 4: Cost Effectiveness Analysis

There is no technologically feasible option in Step 3. Therefore, cost-effectiveness analysis is not required.

Step 5: Select BACT

BACT requirement is to use natural gas or LPG fuels to reduce SOx, PM_{10} and VOC emissions.

APPENDIX D
HRA Summary

San Joaquin Valley Air Pollution Control District
Risk Management Review

To:	Rupi Gill – Permit Services
From:	Cheryl Lawler – Technical Services
Date:	June 1, 2015
Facility Name:	Ingomar Packing
Location:	9950 S. Ingomar Grade, Los Banos
Application #(s):	N-1276-3-15 & 15-5
Project #:	N-1151370

A. RMR SUMMARY

RMR Summary			
Categories	**Natural Gas Boiler Increase (Unit 15-5)**	**Project Totals**	**Facility Totals**
Prioritization Score	0.01	0.01	>1
Acute Hazard Index	0.00	0.00	0.18
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk	**5.66E-09**	5.66E-09	1.36E-06
T-BACT Required?	**No**		
Special Permit Conditions?	**Yes**		

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Unit 15-5

1. 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] N

I. Project Description

Technical Services received a request on May 21, 2015, to perform an Ambient Air Quality Analysis (AAQA) and Risk Management Review (RMR) for a proposal to increase the boiler heat input for the boiler permitted under Unit 15-5 from 200,000 MMBtu/yr to 240,000 MMBtu/yr. In order to have no increase in emissions, the facility is proposing to lower the heat input for the boiler permitted under Unit 3-15 from 1,063,560 MMBtu/yr to 1,023,560 MMBtu/yr. Because the hourly rate is not changing, for the RMR, only the increase in the annual natural gas and ammonia for Unit 15-5 was modeled; and for the AAQA, only the annual increase in NOx, SOx, and PM10 for Unit 15-5 was modeled.

II. Analysis

Toxic emissions from the project were calculated using 2001 Ventura County Air Pollution Control District emission factors for natural gas fired external combustion. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905-1, March 2, 2001), risks from the project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEART's database. The prioritization score for the project was less than 1.0 (see RMR Summary Table); however, the cumulative facilitywide prioritization scores totaled to greater than 1.0. Therefore, a refined Health Risk Assessment was required and performed for the project. AERMOD was used with point source parameters outlined below and concatenated 5-year meteorological data from Los Banos to determine maximum dispersion factors at the nearest residential and business receptors. The dispersion factors were input into the HARP model to calculate the Chronic and Acute Hazard Indices and the Carcinogenic Risk for the project.

The following parameters were used for the review:

Analysis Parameters			
Source Type	Point	**Closest Receptor (m)**	182.88
Stack Height (m)	9.45	**Type of Receptor**	Residence
Stack Diameter (m)	1.22	**Location Type**	Rural
Stack Gas Temperature (K)	425	**Increase in Natural Gas**	40 mmscf/yr
Stack Gas Velocity (m/sec)	10.22	**Increase in Ammonia**	179 lbs/yr

Technical Services also performed modeling for criteria pollutants NOx, SOx, and PM_{10}; as well as the RMR for the engine. The emission rates used for criteria pollutant modeling were 248 lb/yr NOx, 114 lb/yr SOx, and 208 lb/yr PM_{10}.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*

Natural Gas Boiler	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	NA	X	NA	X	X
NO_x	NA	X	X	X	Pass
SO_x	NA	NA	X	NA	Pass
PM_{10}	X	X	X	NA	Pass[1]

*Results were taken from the attached PSD spreadsheet.
[1]The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

III. Conclusions

The emissions from the proposed equipment will not cause or contribute significantly to a violation of the State and National AAQS.

The Acute and Chronic Indices are below 1.0; and the maximum individual Cancer Risk associated with the project is **5.66E-09**, which is less than the 1 in a million threshold. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on Page 1 of this report must be included for the proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Attachments

RMR Request Form & Attachments
Project Email
Prioritization
Risk Results
AAQA Results
Facility Summary
AERMOD Non-Regulatory Option Checklist

APPENDIX E
SSPE2 Calculations

CO Emissions:

The facility-wide permit limits total facility CO emissions to 167,538 pounds per year and the applicant is not proposing to change this limit. Hence this project will result in no change in SSPE2 for CO emissions.

NOx, SOx, PM10 & VOC Emissions:

Since the facility is proposing to increase heat input of 40,000 MMBtu/yr on boiler N-1276-15-4 and lower the same amount of heat input on boiler N-1276-3-14 the change in facility SSPE2 will be calculated by adding the difference between the emissions factors of the two boiler for each pollutant times the 40,000 MMBtu/hr heat input.

Change in SSPE				
Pollutant	Change in Rating (MMBtu/yr)	N-1276-15-5 EF (lbs/MMBtu)	N-1276-3-15 EF (lbs/MMBtu)	Annual Change in SSPE (lbs/yr)
NOx	40,000	0.0062	0.008	-72
SOx	40,000	0.00285	0.00285	0
PM10	40,000	0.0076	0.0024	208
VOC	40,000	0.0055	0.0055	0

	SSPE2				
	NOx (lb/yr)	CO (lb/yr)	VOC (lb/yr)	SOx (lb/yr)	PM10 (lb/yr)
SSPE1	33,847	167,538	16,218	15,897	23,818
Emissions Change (lbs/yr)	-72	0	0	0	208
SSPE2	33,775	167,538	16,218	15,897	24,026

APPENDIX F
Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

$NEC_{SLC} = PE2_{SLC} - PE1_{SLC}$, where:

NEC_{SLC} = Quarterly Net Emissions Change for units covered by the SLC.
$PE2_{SLC}$ = PE2 for all units covered by the SLC.
$PE1_{SLC}$ = PE1 for all units covered by the SLC.

The applicant is not changing the combined fuel usage for all the boiler and the project will result in no change in SOx, VOC and CO SLC. The only change will be for NOx and PM10 emissions and will be entered under boiler N-1276-15-5 in the emission change.

N-1276-15-5:

	QNEC (lb/qtr)
NO_X	- 18
SO_X	0
PM_{10}	52
CO	0
VOC	0

APPENDIX G
Compliance Certification

San Joaquin Valley
Unified Air Pollution Control District

HEALTHY AIR LIVING

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

[X] SIGNIFICANT PERMIT MODIFICATION
[ ] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: INGOMAR PACKING COMPANY	FACILITY ID: N-1276
1. Type of Organization: [ ] Corporation [ ] Sole Ownership [ ] Government [X] Partnership [ ] Utility	
2. Owner's Name: Ingomar Packing L.L.C	
3. Agent to the Owner: DAVE WAGGONER	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

DEW ○ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

DEW ○ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

DEW ○ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

DEW ○ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

David E Waggoner — Signature of Responsible Official

5/11/15 — Date

DAVE WAGGONER
Name of Responsible Official (please print)

PLANT MANAGER – PLANT 1
Title of Responsible Official (please print)