



**DEC 01 2015**

Mr. Gilbert Rodriguez  
J R Simplot Company  
P O Box 128  
Helm, CA 93627-0128

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-705  
Project # C-1141398**


Dear Mr. Rodriguez:

The District has issued the Final Renewed Title V Permit for J R Simplot Company. The preliminary decision for this project was made on September 21, 2015. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

Final Title V Permit Renewal Evaluation  
J R Simplot Company  
C-705

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# TITLE V PERMIT RENEWAL EVALUATION

*Fertilizer Production Facility*

**Processing Engineer:** Sajjad Ahmad  
**Lead Engineer:** Brian Clements  
**Date:** November 2, 2015

**Facility Number:** C-705  
**Facility Name:** J R Simplot Company  
**Mailing Address:** P O Box 128  
Helm, CA 93627

**Contact 1 Name:** Gilbert Rodriguez - Production Manager  
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**Responsible Official:** Gilbert Rodriguez  
**Title:** Production Manager

**Project #:** C-1141398  
**Deemed Complete:** May 12, 2014

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## I. PROPOSAL

J R Simplot Company (Simplot) was issued a Title V permit on October 6, 2000. As required by District Rule 2520, the facility is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the last Title V permit renewal that was performed on March 15, 2011.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

During the preliminary notice period, the District received comments from Simplot that are included in Attachment D along with District's responses.

## II. FACILITY LOCATION

The facility is located at 12688 S Colorado Ave in Helm, CA.

## III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment D.

## IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to not use any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of general permit templates.

## V. SCOPE OF EPA AND PUBLIC REVIEW

As mentioned in Section IV above, the applicant is requesting to not use any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of general permit templates. Therefore, the renewed permit in its entirety is subject to EPA and public review.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated

- District Rule 2020, Exemptions (amended December 20, 2007- SIP Approved, amended August 18, 2011, amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended September 21, 2006, amended December 18, 2008 but not in effect until June 10, 2010; amended April 21, 2011 - SIP Approved)
- District Rule 4320, Advanced Emission Reduction Options For Boilers, Steam Generators, And Process Heaters Greater Than 5.0 MMbtu/hr (Adopted October 16, 2008 - SIP Approved)<sup>1</sup>

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<sup>1</sup> District Rule 4320 was adopted on October 16, 2008 before the last Title V permit renewal was done. However, the last Title V permit renewal did not address this rule as the only permit unit C-705-1 that is subject to this rule was not required to be in compliance with this rule at that time.

- District Rule 4702, Internal Combustion Engines - Phase 2 (amended January 18, 2007 - SIP Approved, amended August 18, 2011, amended November 14, 2013)
- 40 CFR 60, Subpart G, Standards for Nitric Acid Plants (amended August 14, 2012)
- 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (amended March 6, 2013)
- 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended June 25, 2013)
- 40 CFR 82, Subpart F, Recycling and Emissions Reduction (amended May 23, 2014)

#### **B. Rules Removed**

There are no applicable rules that were removed since the last Title V permit renewal.

#### **C. Rules Added**

- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011, effective November 26, 2012 – SIP Approved)

#### **D. Rules Not Updated**

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1081, Stack Monitoring (amended December 17, 1992)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)

- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters - Phase 2 (amended August 21, 2003)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters - Phase 3 (amended October 16, 2008)
- District Rule 4351, Boilers, Steam Generators, and Process Heaters - Phase 1 (amended August 21, 2003)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 4701, Internal Combustion Engines - Phase 1 (amended August 21, 2003)
- District Rule 8011, General Requirements (adopted November 15, 2001, amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (adopted November 15, 2001, amended August 19, 2004)
- District Rule 8031, Bulk Materials (adopted November 15, 2001, amended August 19, 2004)

- District Rule 8041, Carryout and Trackout (adopted November 15, 2001, amended August 19, 2004)
- District Rule 8051, Open Areas (adopted November 15, 2001, amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (adopted November 15, 2001, amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (adopted November 15, 2001, amended August 19, 2004)
- 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 40 CFR 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR 64, Compliance Assurance Monitoring (CAM)
- 40 CFR 68, Chemical Accident Prevention Provisions

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

### A. Rules Added

There are no applicable rules that have been added since the previous Title V renewal.

## B. Rules Updated

- **California Code of Regulations (CCR), Title 17 (Public Health), Division 3 (Air Resources), Chapter 1 (Air Resources Board), Subchapter 7.5 (Air Toxic Control Measures), Measure 93115 (Stationary Diesel Engines)**

Permit Units C-705-2, '-10, and '-14 (diesel-fired emergency IC engines):

§ 93115.5 (b)(1) requires that in-use emergency standby engines are required to use only diesel fuels that meet the definition of CARB diesel.

§ 93115.6 (b)(1) stipulates that no owner or operator shall operate any in-use stationary emergency standby diesel-fueled CI engine in response to the notification of an impending rotating outage unless all the following criteria are met:

- (A) the engine's permit to operate allows operation of the engine in anticipation of a rotating outage, or the District has established a policy or program that authorizes operation of the engine in anticipation of a rotating outage; and
- (B) the Utility Distribution Company has ordered rotating outages in the control area where the engine is located, or has indicated it expects to issue such an order at a certain time; and
- (C) the engine is located in a specific location that is subject to the rotating outage; and
- (D) the engine is operated no more than 30 minutes prior to the time when the Utility Distribution Company officially forecasts a rotating outage in the control area; and
- (E) the engine operation is terminated immediately after the Utility Distribution Company advises that a rotating outage is no longer imminent or in effect.

This section applies to emergency standby IC engines that are permitted to operate during non-emergency conditions for the purpose of providing electrical power. However, District Rule 4702 states that emergency standby IC engines may only be operated during non-emergency conditions for the purposes of maintenance and testing. Therefore, this section does not apply and no further discussion is required.



§ 93115.6 (b)(2) requires that no owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine for non-emergency use, including maintenance and testing, during the following periods: (A) whenever there is a school sponsored activity, if the engine is located on school grounds, and (B) between 7:30 a.m. and 3:30 p.m. on days when school is in session, if the engine is located within 500 feet of school grounds. This facility is not located near any schools so these requirements are not applicable.

§ 93115.6 (b)(3) requires that no owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine (>50 bhp) that emits diesel PM at a rate greater than 0.40 g/bhp-hr more than 20 hours per year for maintenance and testing purposes. Engines powering a fire pump are exempt from 20 hours per year limitation.

§ 93115.10 (f)(1) requires that starting January 1, 2005, each owner or operator of an emergency standby diesel-fueled CI engine shall keep records and prepare a monthly summary that shall list and document the nature of use for each of the following:

- (A) emergency use hours of operation;
- (B) maintenance and testing hours of operation;
- (C) hours of operation for emission testing to show compliance with sections 93115.6(a)(3) and 93115.6(b)(3);
- (D) initial start-up testing hours;
- (E) if applicable, hours of operation to comply with the requirements of NFPA 25;
- (F) hours of operation for all uses other than those specified in sections 93115.10(g)(1)(A) through (D) above; and
- (G) if applicable, DRP engine hours of operation, and
- (H) the fuel used.

1. For engines operated exclusively on CARB Diesel Fuel, the owner or operator shall document the use of CARB Diesel Fuel through the retention of fuel purchase records indicating that the only fuel purchased for supply to an emergency standby engine was CARB Diesel Fuel; or
2. For engines operated on any fuel other than CARB Diesel Fuel, fuel records demonstrating that the only fuel purchased and added to an emergency standby engine or engines, or to any fuel tank directly attached to an emergency standby engine or engines, meets the requirements of section 93115.5(b).

§ 93115.10 (f)(2) Records shall be retained for a minimum of 36 months. Records for the prior 24 months shall be retained on-site, either at a central location or at the engine's location, or at an offsite central location within California, and shall be made immediately available to the District staff upon request. Records for the prior 25 to 36 months shall be made available to District staff within 5 working days from request.

Permit Unit C-705-2 (469 bhp diesel-fired emergency generator IC engine):  
The ATCM requirements have been incorporated into the renewed PTO '-2-3 as conditions 4, 5, 6, 17, 18, and 19.

Permit Unit C-705-10 (157 bhp diesel-fired emergency IC engine driving a fire water pump):  
The ATCM requirements have been incorporated into the renewed PTO '-10-3 as conditions 4, 5, 6, 16, 17, and 18.

Permit Unit C-705-14 (1,200 bhp diesel-fired emergency generator IC engine):  
The ATCM requirements have been incorporated into the renewed PTO '-14-5 as conditions 5 thru 9, 20, 21, and 22.

### C. Rules Not Updated

- **District Rule 1160, Emission Statements**  
(amended November 18, 1992)

For this facility, condition 3 of the requirements for renewed PTO C-705-0-3 is based on this rule and is not Federally Enforceable through Title V.

- **District Rule 4102, Nuisance**  
(amended December 17, 1992)

For this facility, condition 41 of the requirements for renewed PTO C-705-0-3 is based on this rule and is not Federally Enforceable through Title V.

In addition, condition 1 of PTO '-5-4 and condition 2 of PTO '-15-1 were removed as these conditions are duplicate to condition 41 of the facility wide PTO '-0-3.

## VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section serves to address rules that have been amended or added since the issuance of the last Title V permit renewal. This section will also address rules not adequately addressed in the last Title V renewal.

### A. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions.

For this facility, condition 4 of the requirements for renewed PTO C-705-0-3 is based on this rule and the amendments to this rule do not have any effect on this condition.

### B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since last Title V permit renewal. This Title V permit renewal does not constitute a modification per section 3.25, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

For clarity, permit condition 9 on the renewed PTO C-705-15-2 has been revised as follows to identify the operating range of the pressure differential gauges for the bin vent filter and the baghouse serving the unit:

- The bin vent filter and the baghouse shall operate at all times with a minimum differential pressure of 0.2 inches water column and a maximum differential pressure of 5 inches water column. [District Rule 2201]

**C. District Rule 2410 – Prevention of Significant Deterioration**

This rule was added on June 16, 2011 and became effective on November 26, 2012. This Title V renewal is not a PSD modification and none of the current PTOs have any PSD conditions; therefore, it is not necessary to update the permits to address this rule at this time.

**D. District Rule 4320 - Advanced Emission Reduction Options For Boilers, Steam Generators, And Process Heaters Greater Than 5.0 MMBtu/Hr**

Permit Unit C-705-1 (71.4 MMBtu/hr boiler)

This rule was not addressed in the last Title V permit renewal as permit unit C-705-1 was not required to be in compliance with this rule at that time.

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO), oxides of sulfur (SO<sub>2</sub>), and particulate matter 10 microns or less (PM<sub>10</sub>) from boilers, steam generators, and process heaters.

**Section 5.0, Requirements**

Section 5.1 lists three options for facilities to comply with the requirements of the rule. Previously the facility had chosen to comply with the option described in Section 5.1.2, which requires to pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4.

However, with the implementation of ATC C-705-1-8, the facility has chosen to comply with the option described in Section 5.1.1, which requires the facility to comply with the emission limits in Sections 5.2 and 5.4.

### **Section 5.2, NOX and CO Emission Limits**

Section 5.2 includes Table 1 that lists the applicable NOx emission limits for various categories. The boiler is equipped with an SCR system and meets the NOx emission limit of 5 ppmv @ 3.0% O<sub>2</sub> listed as enhanced schedule under Category B in Table 1. The required CO emissions limit is 400 ppmv @ 3.0% O<sub>2</sub> for all categories.

The following conditions on the current permit satisfy these requirements:

- NOx emissions shall not exceed 5 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4305, 4306, 4320 and 4351]
- CO emissions shall not exceed 200 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4305, 4306, 4320 and 4351]

### **Section 5.4, Particulate Matter Control Requirements**

Section 5.4 requires the operator to comply with one of the following requirements to limit particulate matter emissions:

- 5.4.1.1 Fire the unit exclusively on PUC-quality natural gas, commercial propane, or a combination of such gases;
- 5.4.1.2 Limit fuel sulfur content to no more than five grains of total sulfur per 100 standard cubic feet; or
- 5.4.1.3 Install and properly operate an emission control system that reduces SO<sub>2</sub> emissions by at least 95%, by weight, or limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv, corrected to 3.0% O<sub>2</sub>.

The boiler is fired exclusively on PUC-quality natural gas, pursuant to section 5.4.1.1 and the following conditions on the current permit satisfy these requirements:

- This unit shall be fired exclusively on PUC quality natural gas. [District Rules 2201 and 4320]
- Emissions shall not exceed any of the following limits: 0.0076 lb-PM10/MMBtu, 0.0006 lb-SOx/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201; 4305, 4306, 4320 and 4351]

**Section 5.5, Low-Use Unit**

Section 5.5 applies to the units installed prior to January 1, 2009 and limited to less than or equal to 1.8 billion Btu per calendar year heat input pursuant to a District Permit to Operate.

The boiler is not limited to less than or equal to 1.8 billion Btu per calendar year heat input; therefore, this section is not applicable.

**Section 5.6, Start-up and Shut Down**

Section 5.6 states startup and shut down requirements. Since Simplot has not proposed that the emissions would be different during startup or shut down, this section is not applicable. The boiler is currently permitted to meet the steady state emissions requirements at all times of operation.

**Section 5.7, Monitoring Provisions**

Section 5.7.1 requires that the operator of any unit subject to the applicable emission limits in Sections 5.2 shall install and maintain an operational APCO approved Continuous Emissions Monitoring System (CEMS) for NO<sub>x</sub>, CO, and oxygen, or implement an APCO-approved Alternate Monitoring System. Simplot uses a pre-approved alternate emissions monitoring scheme (monitoring using a District-approved portable analyzer for NO<sub>x</sub>, CO and O<sub>2</sub> and using Draeger tubes, or equivalent for ammonia slip). The following conditions on the current permit satisfy these requirements:

- {3298} The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> at least once during each month in which source testing is not performed. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH<sub>3</sub> monitoring shall be conducted utilizing Draeger tubes or a 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, 4320, and 4351]

- {3299} If the NO<sub>x</sub>, CO or NH<sub>3</sub> 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 ammonia 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, 4320 and 4351]
- {3300} All NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia 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 NO<sub>x</sub>, CO and O<sub>2</sub> analyzer as well as the NH<sub>3</sub> 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, 4320 and 4351]
- {3301} Ammonia emission readings shall be conducted at the time the NO<sub>x</sub>, CO and O<sub>2</sub> readings are taken. The readings shall be converted to ppmvd @ 3% O<sub>2</sub>. [District Rules 4305, 4306, 4320 and 4351]
- {3302} The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub>, CO and NH<sub>3</sub> concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH<sub>3</sub> 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, 4320 and 4351]

**Section 5.7.6, Monitoring SOx Emissions**

Section 5.7.6 outlines requirements for monitoring SOx emissions. Section 5.7.6.1 requires the operator of any unit that proposes to comply with Section 5.4.1.1 (fired exclusively on PUC-quality natural gas, commercial propane, butane, LPG, or a combination of these fuel gases) or Section 5.4.1.2 (fuel sulfur content limit of 5 grains/100 scf) to provide an annual fuel analysis.

The unit is fired exclusively on PUC-quality natural gas, which per District Policy APR 1720, the District assumes has a sulfur content not exceeding 1.0 grains/100 scf. Therefore, the District will accept analyses or other equivalent certification documents from the fuel supplier for demonstrating compliance with the SOx emission monitoring requirement. The following condition on the current permit satisfies these requirements:

- {4356} 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]

**Section 5.8, Compliance Determination**

Section 5.8.1 requires that the operator of any unit shall have the option of complying with either the applicable heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.2. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling).

The following condition on the current permit satisfies these requirements:

- {Modified 2976} The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320 and 4351]

Section 5.8.2 requires that 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.

The following condition on the current permit satisfies these requirements:



- {Modified 2972} All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, 4320 and 4351]

Section 5.8.5 requires that for emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, 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.

The following condition on the current permit satisfies these requirements:

- {Modified 2980} For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, 4320 and 4351]

### **Section 6.1, Recordkeeping**

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.5 shall be maintained for five calendar years and shall be made available to the APCO upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.

The following condition on the current permit satisfies these requirements:

- {Modified 2983} All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(i)]

Section 6.1.2 requires that the operator of a unit subject to Section 5.5 shall record the amount of fuel use at least on a monthly basis.

Since this unit is not subject to the requirements listed in Section 5.5, it is not subject to Section 6.1.2 requirements.

Section 6.1.3 requires that the operator of a unit subject to Section 5.5.1 or 6.3.1 shall maintain records to verify that the required tune-up and the required monitoring of the operational characteristics have been performed.

This unit is not subject to Section 5.5.1. Therefore, the requirements of this section do not apply.

Section 6.1.4 requires that the operator of a unit with startup or shutdown provisions keep records of the duration of the startup or shutdowns.

The applicant has not proposed that the NO<sub>x</sub> emissions from this boiler will be different during start-up or shutdown events; therefore, the requirements of this section do not apply.

Section 6.1.5 requires that the operator of a unit fired on liquid fuel during PUC-quality natural gas curtailment periods record the sulfur content of the fuel, amount of fuel used, and duration of the natural gas curtailment period.

The applicant has not proposed the use of curtailment fuels; therefore, the requirements of this section do not apply.

### **Section 6.2, Test Methods**

Section 6.2, Test Methods, identifies the test methods as District-approved source testing methods for all applicable pollutants.

The following conditions on the current permit satisfy these requirements:

- {109} Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
- {Modified 2977} NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, 4320 and 4351]
- {Modified 2978} CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]
- {Modified 2979} Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]

- {3278} Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081]

### **Section 6.3, Compliance Testing**

Section 6.3.1 requires that units be tested to determine compliance with the applicable requirements of section 5.1 and 5.3 not less than once every 12 months. Upon demonstrating compliance on two consecutive compliance source tests, the following source test may be deferred for up to thirty-six months. The following conditions on the current permit satisfy these requirements:

- Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4305, 4306, 4320 and 4351]
- {110} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

Therefore, compliance with District Rule 4320 is expected.

### **E. District Rule 4702 - Internal Combustion Engines - Phase 2**

Permit Units C-705-2, '-10, and '-14 (diesel-fired emergency IC engines):

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SO<sub>x</sub>) from internal combustion engines. This rule applies to any internal combustion engine rated at 25 brake horsepower or greater.

The engines under PTOs C-705-2, '-10, and '-14 are emergency standby IC engines and are exempt from the requirements of Rule 4702 except for the requirements of Section 5.9 and 6.2.3. No change was made to these sections in the latest non-SIP approved version of the rule. Therefore, the requirements of Sections 5.9 and 6.2.3 of the current non-SIP approved version of the rule are at least as stringent as the requirements of the SIP approved version of the rule. Therefore, stringency analysis of the current non-SIP approved version of the rule is not required.

Permit Units C-705-2 and '-14 (diesel-fired emergency IC engines powering electrical generators):

Pursuant to Section 4.2, except for the requirements of Sections 5.9 and 6.2.3, the requirements of this rule shall not apply to an emergency standby engine or a low-use engine, provided that the engine is operated with an operating nonresettable elapsed time meter.

- 4.2.1 In lieu of operating a nonresettable elapsed time meter, the operator may use an alternative device, method, or technique, in determining operating time, provided that the alternative is approved by the APCO and EPA and is allowed by the Permit-to-Operate or Permit-Exempt Equipment Registration. The operator must demonstrate that the alternative device, method, or technique is equivalent to using a nonresettable elapsed time meter.
- 4.2.2 The operator shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

Section 3.15 defines an "Emergency Standby Engine" an internal combustion engine which operates as a temporary replacement for primary mechanical or electrical power during an unscheduled outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the operator. An engine shall be considered to be an emergency standby engine if it is used only for the following purposes: (1) periodic maintenance, periodic readiness testing, or readiness testing during and after repair work; (2) unscheduled outages, or to supply power while maintenance is performed or repairs are made to the primary power when normal electrical power line service has not failed, or (2) to produce power for the utility electrical distribution system, or (3) in conjunction with a voluntary utility demand reduction program or interruptible power contract.

Therefore, the emergency standby IC engines only have to meet the requirements of Sections 5.9 and 6.2.3 of this Rule.

Section 5.9 of this rule requires that the owner of an emergency standby engine shall comply with the requirements specified in Section 5.9.2 through Section 5.9.5 below:

- 5.9.2 Properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier.

5.9.3 Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.

5.9.4 Install and operate a nonresettable elapsed time meter.

5.9.4.1 In lieu of installing a nonresettable elapsed time meter, the operator may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA and is allowed by a Permit-to-Operate or Permit-Exempt Equipment Registration condition.

5.9.4.2 The operator shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

Section 5.9.5 applies only to AO spark-ignited engines; therefore, not applicable to these engines.

Section 6.2.3 requires that an operator claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request. The records shall include, but are not limited to, the following:

- 6.2.3.1 Total hours of operation,
- 6.2.3.2 The type of fuel used,
- 6.2.3.3 The purpose for operating the engine,
- 6.2.3.4 For emergency standby engines, all hours of non-emergency and emergency operation shall be reported, and
- 6.2.3.5 Other support documentation necessary to demonstrate claim to the exemption.

The requirements of this rule are satisfied via the permit conditions identified below for each unit:

The latest 4702 requirements have been incorporated into the renewed PTO '2-3 for 469 bhp diesel-fired emergency IC engine as conditions 1, 4, 6 thru 9, and 17 thru 19.

The latest 4702 requirements have been incorporated into the renewed PTO '14-5 for 1,200 bhp diesel-fired emergency IC engine as conditions 1, 5, 9 thru 12, and 20 thru 22.

Permit Unit C-705-10 (diesel-fired emergency IC engine driving an emergency fire water pump):

Pursuant to Section 4.3.1, except for the requirements of Section 6.2.3, the requirements of this rule shall not apply an internal combustion engine that meets the following conditions:

- 4.3.1.1 The engine is operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood; and
- 4.3.1.2 Except for operations associated with Section 4.3.1.1, the engine is limited to operate no more than 100 hours per calendar year as determined by an operational nonresettable elapsed time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine; and
- 4.3.1.3 The engine is operated with an operational nonresettable elapsed time meter. In lieu of installing a nonresettable elapsed time meter, the operator of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA. The operator of the engine shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

Section 3.15 defines an "Emergency Standby Engine" an internal combustion engine which operates as a temporary replacement for primary mechanical or electrical power during an unscheduled outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the operator. An engine shall be considered to be an emergency standby engine if it is used only for the following purposes: (1) periodic maintenance, periodic readiness testing, or readiness testing during and after repair work; (2) unscheduled outages, or to supply power while maintenance is performed or repairs are made to the primary power when normal electrical power line service has not failed, or (2) to produce power for the utility electrical distribution system, or (3) in conjunction with a voluntary utility demand reduction program or interruptible power contract.

Therefore, the emergency standby IC engine only has to meet the requirements of Section 6.2.3 of this Rule.

Section 6.2.3 requires that an operator claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request. The records shall include, but are not limited to, the following:

- 6.2.3.1 Total hours of operation,
- 6.2.3.2 The type of fuel used,
- 6.2.3.3 The purpose for operating the engine,
- 6.2.3.4 For emergency standby engines, all hours of non-emergency and emergency operation shall be reported, and
- 6.2.3.5 Other support documentation necessary to demonstrate claim to the exemption.

The requirements of this rule are satisfied via the permit conditions identified below for each unit:

The latest 4702 requirements have been incorporated into the renewed PTO '-10-3 as conditions 4, 6 thru 8, and 16 thru 18.

**F. 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

Permit Units C-705-2, '-10, and '-14 (diesel-fired emergency IC engines):

Since the existing compression ignited IC engines C-705-2, '-10 and '-14 at this facility do not qualify for any of the exemptions listed in 40 CFR part 63, subpart ZZZZ §63.6590(c)(1) thru (c)(7), they are not subject to 40 CFR 60 Subpart IIII and instead are subject to 40 CFR part 63, subpart ZZZZ.

**G. 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

Permit Units C-705-2, '-10, and '-14 (diesel-fired emergency IC engines):

**§ 63.6580 Purpose**

Subpart ZZZZ establishes national emission limitations and operating limitations for Hazardous Air Pollutants (HAP) emitted from stationary Reciprocating Internal Combustion Engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

**§ 63.6585 Applicability**

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand. As such, all IC engines at this facility are subject to this subpart.

**§ 63.6590 What parts of my plant does this subpart cover?**

This subpart applies to each affected source.

(a) *Affected source.* An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

Persuant to definitions under §63.6675, Hazardous air pollutants (HAP) means any air pollutants listed in or pursuant to Section 112(b) of the CAA.

None of the pollutants from this facility are included in the HAP list of Section 112(b) of the CAA; therefore, this facility is not a major HAP source and instead is an area source for the purpose of this subpart.

Since this facility is an area source of HAP emissions, this subpart applies.

(1) Existing stationary RICE.

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

The engines under permit units C-705-2, '-10, and '-14 commenced construction before June 12, 2006; therefore, these are existing engines.

(3) The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

- (i) Existing spark ignition 2 stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;
- (ii) Existing spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;
- (iii) Existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;
- (iv) Existing limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;



- (v) Existing stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;
- (vi) Existing residential emergency stationary RICE located at an area source of HAP emissions;
- (vii) Existing commercial emergency stationary RICE located at an area source of HAP emissions; or
- (viii) Existing institutional emergency stationary RICE located at an area source of HAP emissions.

The existing engines at this facility do not qualify for any of the exemptions listed in (3)(i) thru (3)(viii) above.

(c) *Stationary RICE subject to Regulations under 40 CFR Part 60.* An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII for compression ignition engines or 40 CFR part 60 subpart JJJJ for spark ignition engines. No further requirements apply for such engines under this part.

- (1) A new or reconstructed stationary RICE located at an area source;
- (2) A new or reconstructed 2SLB stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
- (3) A new or reconstructed 4SLB stationary RICE with a site rating of less than 250 brake HP located at a major source of HAP emissions;
- (4) A new or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
- (5) A new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;
- (6) A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;
- (7) A new or reconstructed compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

Since the existing compression ignited IC engines C-705-2, '-10 and '-14 at this facility do not qualify for any of the exemptions listed in (c)(1) thru (c)(7) above, they are not subject to 40 CFR part 60 subpart IIII and instead are subject to this subpart.

**§ 63.6595 When do I have to comply with this subpart?**

- (a) *Affected sources.* (1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

For emergency engines, Subpart ZZZZ requirements will not necessitate an Authority to Construct in order to modify the permits to show compliance with Subpart ZZZZ. Therefore, for these emergency engines, compliance with Subpart ZZZZ will be discussed.

**§ 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?**

- (a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 1b and Table 2b to this subpart that apply to you.

Note, there are no Table 1b or Table 2b operating limitations for emergency engines.

**Table 2d to Subpart ZZZZ of Part 63 - Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions.**

As stated in §§63.6603 and 63.6640, the following table applies to existing stationary RICE located at area sources of HAP emissions:

For each . . .	You must meet the following requirements, except during periods of startup . . .	During periods of startup you must . . .
4. Emergency stationary CI RICE and black start stationary CI RICE.*	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;	N/A
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and	N/A
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	N/A

\*If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

**§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?**

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions.

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

**§ 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?**

(f) *Requirements for emergency stationary RICE.*

(1) If you own or operate an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

(i) There is no time limit on the use of emergency stationary RICE in emergency situations.

(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

(iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

**Table 6 to Subpart ZZZZ of Part 63 - Continuous Compliance With Emission Limitations, Operating Limitations, Work Practices, and Management Practices**

As stated in §63.6640, you must continuously comply with the emissions and operating limitations and work or management practices as required by the following:

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
9. Existing emergency and black start stationary RICE located at an area source of HAP, and  Existing non-emergency 4SLB and 4SRB stationary RICE ≤ 500 HP located at an area source of HAP	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

**§ 63.6645 What notifications must I submit and when?**

There are no notifications necessary for the existing engines at this facility.

**§ 63.6650 What reports must I submit and when?**

There are no report submittals necessary for existing engines at this facility.

**§ 63.6655 What records must I keep?**

(a) If you must comply with the emission and operating limitations, you must keep the records as follows:

- (2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- (3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).
- (4) Records of all required maintenance performed on the air pollution control and monitoring equipment.
- (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE:

- (2) An existing stationary emergency RICE.

(f) If you own or operate any of the stationary RICE in paragraph (f)(2) below, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

**§ 63.6660 In what form and how long must I keep my records?**

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

Per the discussion above, the following conditions have been added to the renewed PTOs C-705-2-3, '-10-3, and '-14-5:

Permit Unit	Conditions
C-705-2-3	1, 4, 6, 10 thru 16, and 19
C-705-10-3	4, 6, 9 thru 15, and 18
C-705-14-5	1, 5, 9, 13 thru 19, and 22

- The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] - §63.6585/63.6595(a)
- The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] - §63.6625(h)
- The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] - §63.6603/63.6640 Table 2d, Row 4.a
- The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] - §63.6603/63.6640 Table 2d, Row 4.b

- The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] - §63.6603/63.6640 Table 2d, Row 4.c
- {modified 3404} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] - §63.6625(f)
- {modified 4261} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] - Table 6
- {modified 3495} This engine shall be operated only for maintenance, testing, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 100\* hours per year. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] - §63.6640(f)(ii)

\*Note: The permitted hours are lower since the State ATCM is the limiting factor. Each emergency engine permit has the appropriate hour limitation, as was determined during previous permitting projects.

- The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ]



- The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] - §63.6655(a)(2) and (a)(5)
- {modified 3873} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4702, 2520, 9.4, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] - §63.6660

#### **H. 40 CFR 60, Subpart G, Standards of Performance for Nitric Acid Plants**

Section 60.70 of this subpart was updated on August 14, 2012, since the last Title V renewal was done on March 15, 2011. No other sections of this subpart were updated since the last permit renewal.

##### **§60.70 Applicability and designation of affected facility.**

§60.70(a) states that the provisions of this subpart are applicable to each nitric acid production unit, which is the affected facility.

§60.70(b) states that any facility under paragraph (a) of this section that commences construction or modification after August 17, 1971, and on or before October 14, 2011 is subject to the requirements of this subpart. Any facility that commences construction or modification after October 14, 2011 is subject to subpart Ga of this part.

§60.2 defines modification as any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

Permit unit C-705-3 has not gone through a modification pursuant to criteria of §60.2 on or after October 14, 2011; therefore, this permit unit is subject to the requirements of subpart G.

**§ 60.72 Standard for nitrogen oxides**

Section (a)(1) and (2) require that any gases discharged into the atmosphere from the nitric acid plant shall not contain nitrogen oxides (NO<sub>2</sub>) in excess of 3.0 lb/ton of 100% nitric acid produced and shall not exhibit 10% opacity or greater. Compliance with these requirements is assured by condition 8 of the renewed PTO '3-14.

**§ 60.73 Emission monitoring**

Section (a) requires that a continuous monitoring system for measuring nitrogen oxides shall be installed, operated, and maintained. Conditions 2 and 3 of renewed PTO '3-14 ensure compliance with these requirements.

Section (b) requires the owner or operator to establish the conversion factor in order to convert monitoring data into unit of applicable standard. Condition 9 of renewed PTO '3-14 ensures compliance with this requirement.

Section (c), the daily production rate and hours of operation shall be recorded and kept for inspection. Condition 4 of renewed PTO '3-14 ensures compliance with this requirement.

**I. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)**

**§64.2 - Applicability**

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

1. The unit must have an emission limit for the pollutant;
2. The unit must have add-on controls for the pollutant (these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers); and
3. The unit must have a pre-control potential to emit of greater than the major source thresholds.

Major Source Thresholds		
Pollutant	lb/year	ton/year
NO <sub>x</sub>	20,000	10
SO <sub>x</sub>	140,000	70
PM <sub>10</sub>	140,000	70
CO	200,000	100
VOC	20,000	10

Permit Unit C-705-1 (71.4 MMBtu/hr boiler with SCR and FGR)

- (1) This unit contains an emission limit for NO<sub>x</sub> of 5 ppmvd @3% O<sub>2</sub> or 0.0062 lb/MMBtu (per Rules 2201, 4305, 4306, 4320, and 4351).
- (2) This unit is equipped with Selective Catalytic Reduction (SCR) and Flue Gas Recirculation (FGR) systems for NO<sub>x</sub> control. FGR results in up to 60% control<sup>2</sup>. To calculate uncontrolled NO<sub>x</sub> emissions without SCR, the previous NO<sub>x</sub> limit of 30 ppmvd @3% O<sub>2</sub> or 0.036 lb/MMBtu will be used.
- (3) Uncontrolled NO<sub>x</sub> emissions:

$$\text{Annual Uncontrolled PE} = [0.036 \text{ lb-NO}_x\text{/MMBtu} \times 9,000 \text{ MMBtu/yr} \div (1 - 0.6)]$$

$$\text{Annual Uncontrolled PE} = 810 \text{ lb-NO}_x\text{/year}$$

As shown above, the uncontrolled PE for NO<sub>x</sub> emissions is less than the major source threshold (20,000 lb/year). Therefore, this unit is not subject to the requirements of 40 CFR 64 for NO<sub>x</sub>.

Similarly CAM is not required for other pollutants as there are emissions limits on the current permit but there are no add-on controls for those pollutants (SCR system is not equipped with oxidation catalyst, so it is controlling only NO<sub>x</sub> emissions and not affecting other pollutants).

Permit Units C-705-2, '-10, and '-14 (Emergency IC engines)

These units do not contain add on control devices for any pollutant; therefore, are not subject to CAM.

Permit Unit C-705-3 (Nitric Acid Plant – NO<sub>2</sub> to N<sub>2</sub> combustor)

- (1) This unit contains an emission limit for NO<sub>2</sub> of 180 ppm (per District Rules 1080 and 2201; 40 CFR 60.72 (a) and 60.73)
- (2) This unit is equipped with a NO<sub>2</sub> to N<sub>2</sub> butane fired combustor for NO<sub>x</sub> emissions control, which is an add-on control for NO<sub>x</sub> emissions.
- (3) Uncontrolled emissions:

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<sup>2</sup> Per [http://205.153.241.230/P2\\_Opportunity\\_Handbook/12\\_7.html](http://205.153.241.230/P2_Opportunity_Handbook/12_7.html)

Simplot stated under District project C-1123368 that the maximum air flow rate for the nitric acid plant stack is 26,000 dscfm. Converting the 180 ppm NO<sub>x</sub> emission limit to a lb/ton-HNO<sub>3</sub> value is as follows:

$$180 \text{ scf-NO}_x/10^6 \text{ scf exhaust} \times \text{lb-mol}/379.5 \text{ scf-NO}_x \times 46 \text{ lb-NO}_x/\text{lb-mol} \times 26,000 \text{ scf-exhaust}/\text{min} \times 1440 \text{ min}/\text{day} = 816.9 \text{ lb-NO}_x/\text{day}$$

Thus

$$\text{PE} = 816.9 \text{ lb-NO}_x/\text{day}$$

NO<sub>2</sub> to N<sub>2</sub> combustor's control efficiency = 95% (project C-1123368)

$$\begin{aligned} \text{Annual Uncontrolled PE} &= [816.9 \text{ lb-NO}_x/\text{day} \times 365 \text{ days}/\text{year} \div (1 - 0.95)] \\ &= 5,963,370 \text{ lb-NO}_x/\text{year} \end{aligned}$$

As shown above, the uncontrolled PE for NO<sub>x</sub> emissions is greater than the major source threshold (20,000 lb/year). Therefore, this unit could be subject to CAM. However, 40 CFR §64.3(d) states that if a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS) is required pursuant to other authority under the Act or state or local law, the owner or operator shall use such system to satisfy the requirements of this part. Since the unit is equipped with CEMS for NO<sub>x</sub> emissions as required by conditions 2, 9 and 12 of current PTO '3-15, CAM is satisfied.

In addition, the permit unit has emissions limits for particulate matter and sulfur emissions, but there are no add-on controls for these pollutants. Therefore, CAM is not required for these pollutants.

#### Permit Unit C-705-4 - Calcium Ammonium Nitrate (CAN-17) Plant

- (1) This unit contains the following emission limits: 0.004 lb-PM<sub>10</sub>/ton, 0.0005 lb-NH<sub>3</sub>/ton, 0.0039 lb-nitric acid/ton (per Rule 2201)
- (2) This unit is equipped by 2 scrubbers for PM<sub>10</sub>, NH<sub>3</sub>, and nitric acid control.
- (3) Uncontrolled emissions:

PM<sub>10</sub>

Where:

$$\text{PE} = 2.0 \text{ lb-PM}_{10}/\text{day} \text{ (project C-980712)}$$

Scrubber PM<sub>10</sub> control = 95% (project C-950651)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [2.0 \text{ lb-PM}_{10}/\text{day} \times 365 \text{ days/yr} \div (1-0.95)] \\ &= 14,600 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

### NH<sub>3</sub>

Where:

PE = 0.2 lb-NH<sub>3</sub>/day (project C-980712)

Scrubber NH<sub>3</sub> control = 95% (project C-950651)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [0.2 \text{ lb-NH}_3/\text{day} \times 365 \text{ days/yr} \div (1-0.95)] \\ &= 1,460 \text{ lb-NH}_3/\text{year}\end{aligned}$$

### Nitric Acid

Where:

PE = 2.0 lb-nitric acid/day (project C-980712)

Scrubber nitric acid control = 95% (Conservative Estimate)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [2.0 \text{ lb-nitric acid/day} \times 365 \text{ days/yr} \div (1-0.95)] \\ &= 14,600 \text{ lb-nitric acid/year}\end{aligned}$$

As shown above, the uncontrolled PE for PM<sub>10</sub>, NH<sub>3</sub>, and nitric acid emissions is less than the major source threshold for PM<sub>10</sub> (140,000 lb/year). The major source threshold has been used for NH<sub>3</sub> and nitric acid as the nature of those emissions are closest to PM<sub>10</sub> compared to other pollutants with major source thresholds (SO<sub>x</sub>, CO, VOC, and NO<sub>x</sub>). Therefore, this unit is not subject to CAM.

### Permit Unit C-705-5 (Liquid Ammonium Phosphate Unit)

- (1) This unit contains an emission limit of 0.001 lb-PM<sub>10</sub>/ton (per Rule 2201)
- (2) This unit is equipped with a scrubber for PM<sub>10</sub> control.
- (3) Uncontrolled emissions:

Where:

PE = 120 lb-PM<sub>10</sub>/yr (project C-1081235)

Scrubber control = 95% (project C-950651)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [120 \text{ lb-PM}_{10}/\text{yr} \div (1-0.95)] \\ &= 2,400 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

As shown above, the uncontrolled PE for PM<sub>10</sub> emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to CAM.

Permit Unit C-705-6 (Ammonium Nitrate Plant)

- (1) This unit contains an emission limit of 0.1 grains/dscf (per Rule 4201)
- (2) This unit is equipped with a scrubber for PM<sub>10</sub> control.
- (3) Uncontrolled emissions:

Where:

Controlled PE = 4,125 lb-PM<sub>10</sub>/yr (project C-1081235)  
Scrubber control = 95% (project C-950651)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [4,125 \text{ lb-PM}_{10}/\text{yr} \div (1-0.95)] \\ &= 82,500 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

As shown above, the uncontrolled PE for PM<sub>10</sub> emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to CAM.

Permit Unit C-705-11, '-12, and '-13 (Fertilizer Unloading)

These units do not contain add on control devices for any pollutant; therefore, are not subject to CAM.

Permit Unit C-705-15 (Limestone Receiving, Storing and Handling)

- (1) This unit contains an emission limit for PM<sub>10</sub> of 0.01 gr/scf (per Rule 2201)
- (2) This unit is equipped with a baghouse for PM<sub>10</sub> control.
- (3) Uncontrolled emissions:

Where:

PE = 1,206 lb-PM<sub>10</sub>/year (project C-1071722)

Baghouse control = 99% (District Practice)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [1,206 \text{ lb-PM}_{10}/\text{year} \div (1 - 0.99)] \\ &= 120,600 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

As shown above, the uncontrolled PE for PM<sub>10</sub> emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to CAM.

#### **J. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone**

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in conditions 29 and 30 of the facility-wide permit C-705-0-3.

### **IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

#### **A. Requirements Addressed by Model General Permit Templates**

The applicant is not requesting to use any model general permit templates for this Title V renewal project.

#### **B. Requirements not Addressed by Model General Permit Templates**

The applicant is not requesting any new permit shields within this Title V renewal project.

### **X. PERMIT CONDITIONS**

See Attachment A – Final Renewed Title V Operating Permit.

## **XI. ATTACHMENTS**

- A. Final Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. J R Simplot Company Comments and District Responses

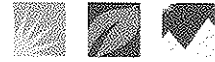


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# ATTACHMENT A

Renewed Title V Operating Permit

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# Permit to Operate

**FACILITY:** C-705

**EXPIRATION DATE:** 11/30/2019

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

J R SIMPLOT COMPANY  
RT 1100-0023  
PO BOX 9168  
BOISE, ID 83707

**FACILITY LOCATION:**

12688 S COLORADO AVE  
HELM, CA 93627

**FACILITY DESCRIPTION:**

FERTILIZER PRODUCTION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Seyed Sadredin**  
Executive Director / APCO

**Arnaud Marjollet**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: C-705-0-3

EXPIRATION DATE: 11/30/2019

## FACILITY-WIDE REQUIREMENTS

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1. 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
2. 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
3. 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
4. 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
5. 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
6. 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
7. 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
8. 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
9. 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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: J R SIMPLOT COMPANY

Location: 12688 S COLORADO AVE, HELM, CA 93627

C-705-0-3 - Nov 16 2015 2:10PM - AHMADS

10. 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
11. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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
18. 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
19. 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
20. 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
21. 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
22. 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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

23. 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
24. 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
25. 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
26. 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
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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
33. 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
34. 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
35. 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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

36. 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
37. 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
38. 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
39. 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
40. 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
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. This facility is subject to 40 CFR part 68. The facility shall submit a risk management plan (RMP) by June 21, 1999, or other dates specified in 40 CFR 68.10. The facility shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit
43. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin November 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due by the last day of the month following the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-1-10

EXPIRATION DATE: 11/30/2019

## EQUIPMENT DESCRIPTION:

71.4 MMBTU/HR UNION IRON WORKS MODEL SPG-50-FS NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM AND FLUE GAS RECIRCULATION (FGR) SYSTEM

## PERMIT UNIT REQUIREMENTS

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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. This unit shall be fired exclusively on PUC quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
3. NOx emissions shall not exceed 5 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
4. CO emissions shall not exceed 200 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
5. Ammonia emissions shall not exceed 10 ppmv @ 3% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions shall not exceed any of the following limits: 0.0076 lb-PM<sub>10</sub>/MMBtu, 0.0006 lb-SO<sub>x</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201; 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
7. The maximum heat input to the unit shall not exceed 9 billion Btu per calendar year. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
8. Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
11. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. [District Rule 4301] Federally Enforceable Through Title V Permit
12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. To demonstrate compliance with this requirement, the unit shall be fired on PUC-quality natural gas or on natural gas with sulfur content not exceeding 4.2% by weight. [District Rule 4801 and County Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
13. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. When determining sulfur emissions by fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails, weekly testing shall resume. [District Rule 2520] Federally Enforceable Through Title V Permit
15. 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
16. If the unit is fired on PUC-regulated natural gas, then the operator shall maintain copies of fuel invoices and supplier certification of fuel sulfur content. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
18. 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
19. 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
20. The source test plan shall identify which basis (ppmvd or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
21. 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 4320. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, 4320 and 4351]
23. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, 4320 and 4351]
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]
25. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]
26. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081]
27. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> at least once during each month in which source testing is not performed. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH<sub>3</sub> monitoring shall be conducted utilizing Draeger tubes or a 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, 4320 and 4351] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



28. If the NO<sub>x</sub>, CO or NH<sub>3</sub> 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 ammonia 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, 4320 and 4351] Federally Enforceable Through Title V Permit
29. All NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia 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 NO<sub>x</sub>, CO and O<sub>2</sub> analyzer as well as the NH<sub>3</sub> 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, 4320 and 4351] Federally Enforceable Through Title V Permit
30. Ammonia emission readings shall be conducted at the time the NO<sub>x</sub>, CO and O<sub>2</sub> readings are taken. The readings shall be converted to ppmvd @ 3% O<sub>2</sub>. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
31. The permittee shall monitor, at least on a monthly basis, the operational characteristics recommended by the unit manufacturer, e.g. the amount of water use, the amount of unit blow down, the exhaust stack temperature, or other characteristics recommended by the unit manufacturer. 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 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub>, CO and NH<sub>3</sub> concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH<sub>3</sub> 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, 4320 and 4351] Federally Enforceable Through Title V Permit
33. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(g)(2)] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(i)] Federally Enforceable Through Title V Permit
35. This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080 and Public Resources Code 21000-21177: California Environmental Quality Act]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-2-3

**EXPIRATION DATE:** 11/30/2019

**EQUIPMENT DESCRIPTION:**

469 BHP (INTERMITTENT) CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801; and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
8. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
9. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
10. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ]
11. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ]
12. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ]
14. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ]
15. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ]
16. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ]
17. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
18. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
19. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-3-14

**EXPIRATION DATE:** 11/30/2019

## **EQUIPMENT DESCRIPTION:**

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH<sub>3</sub> TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO<sub>3</sub> ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO<sub>2</sub> TO N<sub>2</sub> BUTANE FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER

## **PERMIT UNIT REQUIREMENTS**

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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. NO<sub>2</sub> emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201; 40 CFR 60.72 (a) and 60.73] Federally Enforceable Through Title V Permit
3. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
4. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
5. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [District Rule 1080 and 40 CFR 60.73 (e)] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] Federally Enforceable Through Title V Permit
8. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.11 (c) and 60.72 (a)] Federally Enforceable Through Title V Permit
9. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO<sub>3</sub> produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
10. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: J R SIMPLOT COMPANY

Location: 12688 S COLORADO AVE, HELM, CA 93627

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11. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080] Federally Enforceable Through Title V Permit
12. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
13. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-4-10

**EXPIRATION DATE:** 11/30/2019

**EQUIPMENT DESCRIPTION:**

CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

## PERMIT UNIT REQUIREMENTS

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1. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fan air pressure shall be maintained at a minimum of 10 inches of water column to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
10. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-5-9

**EXPIRATION DATE:** 11/30/2019

**EQUIPMENT DESCRIPTION:**

LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.

## PERMIT UNIT REQUIREMENTS

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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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Primary scrubber sprays shall have a minimum water flow rate of 5 gallon per minute and a minimum recirculation flow rate of 200 gallon per minute during unit operation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Secondary scrubber sprays shall have a minimum product flow rate of 50 gallon per minute during unit operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Cooling tower water circulation rate shall not exceed 5,000 gallon per minute [District Rule 2201] Federally Enforceable Through Title V Permit
7. Production rate shall be limited to 600 tons per day or 120,000 tons per year of liquid fertilizer solution. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from the liquid ammonium phosphate fertilizer operation shall not exceed 0.001 lb-PM10 per ton of liquid fertilizer solution produced. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Daily records of liquid fertilizer solution produced shall be maintained in order to verify compliance with the production rate limit. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
11. Weekly records of the flow rates of scrubber liquids shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-6-3

**EXPIRATION DATE:** 11/30/2019

**EQUIPMENT DESCRIPTION:**

190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER

## PERMIT UNIT REQUIREMENTS

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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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Daily records of liquid fertilizer solution production and hours of operation shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
5. Weekly records of the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-10-3

EXPIRATION DATE: 11/30/2019

**EQUIPMENT DESCRIPTION:**

157 BHP (INTERMITTENT) PERKINS MODEL PDFP-L6YW-2506 DIESEL-FIRED EMERGENCY IC ENGINE DRIVING A FIRE WATER PUMP

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Engine shall be equipped with a turbocharger. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rule 4801, County Rule 406 (Fresno), and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
8. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
9. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
10. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
11. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
12. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
13. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
17. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
18. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-11-3

**EXPIRATION DATE:** 11/30/2019

**EQUIPMENT DESCRIPTION:**

MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS

## PERMIT UNIT REQUIREMENTS

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1. Equipment for railcar unloading into storage building consists of a drag flight conveyor, bucket elevator, conveyor belt, conveyor belt brush, shuttle conveyor belt, and shuttle mover. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Equipment for truck loading from storage consists of a drag conveyor, bucket elevator, and telescoping chute. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Equipment for railcar to truck transfer consists of a screw conveyor, incline screw conveyor, and telescoping chute. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. A daily record of monoammonium and ammonium phosphate throughput shall be maintained, kept, and made available to the District upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
6. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
7. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-12-3

**EXPIRATION DATE:** 11/30/2019

**EQUIPMENT DESCRIPTION:**

AMMONIUM SULFATE AND UREA DRY FERTILIZER STORAGE AND UNLOADING OPERATION INCLUDING FOUR BELT CONVEYORS, TWO BUCKET ELEVATORS, TWO SHUTTLE CONVEYORS, CONDITIONER, AND SEVEN BLOW PIPES.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput shall be recorded, maintained, and made available to the District upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-13-3

**EXPIRATION DATE:** 11/30/2019

**EQUIPMENT DESCRIPTION:**

72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput of urea shall be recorded, maintained, and made available to the District upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-14-5

**EXPIRATION DATE:** 11/30/2019

**EQUIPMENT DESCRIPTION:**

1,200 BHP (INTERMITTENT) DETROIT DIESEL MODEL R163-7K35 (16 V-2000) TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
3. 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]
4. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801; and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed any of the following limits: 6.86 g-NO<sub>x</sub>/bhp-hr, 8.50 g-CO/bhp-hr, or 0.97 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. Emissions from this IC engine shall not exceed 1.49 g-PM<sub>10</sub>/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: J R SIMPLOT COMPANY

Location: 12688 S COLORADO AVE, HELM, CA 93627

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12. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
13. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
14. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
19. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
21. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
22. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-15-2

EXPIRATION DATE: 11/30/2019

## EQUIPMENT DESCRIPTION:

LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOT MODEL 60BV36 BIN VENT FILTER AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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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. PM10 emissions from the bin vent filter serving the truck unloading operation shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from the baghouse serving the railcar pneumatic conveyance system shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The maximum throughput for the railcar unloading shed shall not exceed either of the following limits: 432 tons of material per day or 0.0035 lb PM10/ton of material. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from the railcar unloading shed shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from the exhaust of the bin vent filter serving the truck unloading operation and the baghouse serving the railcar conveyance operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
8. The bin vent filter and the baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The bin vent filter and the baghouse shall operate at all times with a minimum differential pressure of 0.2 inches water column and a maximum differential pressure of 5 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Differential operating pressure shall be monitored and recorded on each day that the bin vent filter and baghouse operate. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The bin vent filter and baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: J R SIMPLOT COMPANY

Location: 12688 S COLORADO AVE, HELM, CA 93627

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12. The bin vent filter and baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Replacement bags numbering at least 10% of the total number of bags in each bin vent filter and baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Material removed from each bin vent filter and baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of all maintenance of the baghouses, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-705-0-2

EXPIRATION DATE: 11/30/2014

## FACILITY-WIDE REQUIREMENTS

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1. 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 Rule 110 (Fresno)] Federally Enforceable Through Title V Permit
2. 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 Rule 110 (Fresno)] Federally Enforceable Through Title V Permit
3. 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]
4. 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. [District Rules 2010 and 2020; and County Rule 201 (Fresno)] Federally Enforceable Through Title V Permit
5. 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, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. 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
7. Every application for a permit required under Rule 2010 (12/17/92) (Permits Required) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. 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] Federally Enforceable Through Title V Permit
9. 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] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: J R SIMPLOT COMPANY

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10. 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] Federally Enforceable Through Title V Permit
11. 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 District Rule 2520. [District Rules 2520, 9.5 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. 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, 9.8] Federally Enforceable Through Title V Permit
13. 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, 9.9.2] Federally Enforceable Through Title V Permit
14. 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, 9.9.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.9.4] Federally Enforceable Through Title V Permit
16. 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, 9.9.5] Federally Enforceable Through Title V Permit
17. 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, 9.10] Federally Enforceable Through Title V Permit
18. 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, 9.14.2.1] Federally Enforceable Through Title V Permit
19. 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, 9.14.2.2] Federally Enforceable Through Title V Permit
20. 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, 9.14.2.3] Federally Enforceable Through Title V Permit
21. 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, 9.14.2.4] Federally Enforceable Through Title V Permit
22. 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 (amended 2/17/05), by using EPA method 9. 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] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall supply, sell, solicit or apply any architectural coating, except specialty coatings, that contains more than 250 grams of VOC per liter of coating (less water and exempt compounds, and excluding any colorant added to tint bases), or manufacture, blend, or repackage such coating with more than 250 grams of VOC per liter (less water and exempt compounds, and excluding any colorant added to tint bases) for use within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. No person shall apply, sell, solicit, or offer for sale any specialty architectural coating listed in the Table of Standards (District Rule 4601, Table 1 (12/17/09)), nor manufacture, blend, or repackage such coating for use within the District, which contains VOCs (less water and exempt compounds, excluding any colorant added to tint bases) in excess of the specified limits listed in Table 1 of Rule 4601 (12/17/09). [District Rule 4601, 5.2] Federally Enforceable Through Title V Permit
25. All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. A person shall not use VOCs for the cleanup of spray equipment unless equipment for collection of the cleaning compounds and minimizing its evaporation to the atmosphere is used. [District Rule 4601, 5.5] Federally Enforceable Through Title V Permit
27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.2 (12/17/09). [District Rule 4601, 6.1 and 6.2] Federally Enforceable Through Title V Permit
28. 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, 9.14.1 and 10.0] Federally Enforceable Through Title V Permit
29. 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
30. 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
31. 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 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
32. 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 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
33. 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 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
34. 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 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
35. 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 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8061 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE.  
These terms and conditions are part of the Facility-wide Permit to Operate.

36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 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 (9/16/04) or Rule 8011 (8/19/04). [District Rules 8071 and Rule 8011] Federally Enforceable Through Title V Permit
37. 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
38. 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, 9.17] Federally Enforceable Through Title V Permit
39. 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
40. 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 permit shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. This facility is subject to 40 CFR part 68. The facility shall submit a risk management plan (RMP) by June 21, 1999, or other dates specified in 40 CFR 68.10. The facility shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit
43. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin November 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due by the last day of the month following the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-1-8

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

71.4 MMBTU/HR UNION IRON WORKS MODEL SPG-50-FS NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM AND FLUE GAS RECIRCULATION (FGR) SYSTEM

## PERMIT UNIT REQUIREMENTS

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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. This unit shall be fired exclusively on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. NOx emissions shall not exceed 5 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
4. CO emissions shall not exceed 200 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
5. Ammonia emissions shall not exceed 10 ppmv @ 3% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions shall not exceed any of the following limits: 0.0076 lb-PM<sub>10</sub>/MMBtu, 0.0006 lb-SO<sub>x</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201; 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
7. The maximum heat input to the unit shall not exceed 9 billion Btu per calendar year. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
8. Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
11. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. [District Rule 4301] Federally Enforceable Through Title V Permit
12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. To demonstrate compliance with this requirement, the unit shall be fired on PUC-quality natural gas or on natural gas with sulfur content not exceeding 4.2% by weight. [District Rule 4801 and County Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
13. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. 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
15. 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
16. The source test plan shall identify which basis (ppmvd or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, 4320 and 4351]
18. When determining sulfur emissions by fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails, weekly testing shall resume. [District Rule 2520] Federally Enforceable Through Title V Permit
19. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
20. Source testing to measure NO<sub>x</sub>, CO, and NH<sub>3</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> at least once during each month in which source testing is not performed. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH<sub>3</sub> monitoring shall be conducted utilizing Draeger tubes or a 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, 4320 and 4351] Federally Enforceable Through Title V Permit
22. If the NO<sub>x</sub>, CO or NH<sub>3</sub> 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 ammonia 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, 4320 and 4351] Federally Enforceable Through Title V Permit
23. All NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia 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 NO<sub>x</sub>, CO and O<sub>2</sub> analyzer as well as the NH<sub>3</sub> 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, 4320 and 4351] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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24. Ammonia emission readings shall be conducted at the time the NO<sub>x</sub>, CO and O<sub>2</sub> readings are taken. The readings shall be converted to ppmvd @ 3% O<sub>2</sub>. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
25. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, 4320 and 4351]
26. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]
27. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]
28. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081]
29. The permittee shall monitor, at least on a monthly basis, the operational characteristics recommended by the unit manufacturer, e.g. the amount of water use, the amount of unit blow down, the exhaust stack temperature, or other characteristics recommended by the unit manufacturer. 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 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
30. 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
31. If the unit is fired on PUC-regulated natural gas, then the operator shall maintain copies of fuel invoices and supplier certification of fuel sulfur content. [District Rule 2520] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub>, CO and NH<sub>3</sub> concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH<sub>3</sub> 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, 4320 and 4351] Federally Enforceable Through Title V Permit
33. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(g)(2)] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(i)] Federally Enforceable Through Title V Permit
35. This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080 and Public Resources Code 21000-21177: California Environmental Quality Act]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-2-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

469.0 HP CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY INTERNAL COMBUSTION ENGINE DRIVING A 313 KVA ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District NSR Rule] Federally Enforceable Through Title V Permit
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 5.7 and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702, 5.7] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District NSR Rule and District Rule 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702, 4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702, 5.7] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4702 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-3-17

**EXPIRATION DATE:** 11/30/2014

## **EQUIPMENT DESCRIPTION:**

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH<sub>3</sub> TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO<sub>3</sub> ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO<sub>2</sub> TO N<sub>2</sub> BUTANE FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER

## **PERMIT UNIT REQUIREMENTS**

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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. NO<sub>2</sub> emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
3. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
4. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
5. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] Federally Enforceable Through Title V Permit
8. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
9. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO<sub>3</sub> produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
10. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080] Federally Enforceable Through Title V Permit
12. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
13. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-4-9

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

## PERMIT UNIT REQUIREMENTS

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1. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fan air pressure shall be maintained at a minimum of 10 inches of water column to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-5-4

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. 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 NSR Rule] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Primary scrubber sprays shall have a minimum water flow rate of 5 gallon per minute and a minimum recirculation flow rate of 200 gallon per minute during unit operation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Secondary scrubber sprays shall have a minimum product flow rate of 50 gallon per minute during unit operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Cooling tower water circulation rate shall not exceed 5,000 gallon per minute [District NSR Rule] Federally Enforceable Through Title V Permit
8. Production rate shall be limited to 600 tons per day or 120,000 tons per year of liquid fertilizer solution. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Emissions from the liquid ammonium phosphate fertilizer operation shall not exceed 0.001 lb-PM10 per ton of liquid fertilizer solution produced. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Daily records of liquid fertilizer solution produced shall be maintained in order to verify compliance with the production rate limit. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
12. Weekly records of the flow rates of scrubber liquids shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-6-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER

## PERMIT UNIT REQUIREMENTS

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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 NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Daily records of liquid fertilizer solution production and hours of operation shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
5. Weekly records of the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-10-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

157 HP PERKINS MODEL PDFP-L6YW-2506 DIESEL-FIRED INTERNAL COMBUSTION ENGINE DRIVING AN EMERGENCY FIRE WATER PUMP

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Engine shall be equipped with a turbocharger. [District NSR Rule] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rule 4801, County Rule 406 (Fresno), and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4702, 6.2 and 2520, 9.4 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-11-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS

## PERMIT UNIT REQUIREMENTS

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1. Equipment for railcar unloading into storage building consists of a drag flight conveyor, bucket elevator, conveyor belt, conveyor belt brush, shuttle conveyor belt, and shuttle mover. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Equipment for truck loading from storage consists of a drag conveyor, bucket elevator, and telescoping chute. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Equipment for railcar to truck transfer consists of a screw conveyor, incline screw conveyor, and telescoping chute. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. A daily record of monoammonium and ammonium phosphate throughput shall be maintained, kept, and made available to the District upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
6. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
7. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-12-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

AMMONIUM SULFATE AND UREA DRY FERTILIZER STORAGE AND UNLOADING OPERATION INCLUDING FOUR BELT CONVEYORS, TWO BUCKET ELEVATORS, TWO SHUTTLE CONVEYORS, CONDITIONER, AND SEVEN BLOW PIPES.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput shall be recorded, maintained, and made available to the District upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-13-2

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput of urea shall be recorded, maintained, and made available to the District upon request. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-14-4

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

1200 BHP DETROIT DIESEL MODEL R163-7K35 (16 V-2000) TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
7. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
8. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: 6.86 g-NOx/bhp-hr, 8.50 g-CO/bhp-hr, or 0.97 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. Emissions from this IC engine shall not exceed 1.49 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702 and 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
13. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
14. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
15. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
16. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
17. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
19. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
21. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
22. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-705-15-1

**EXPIRATION DATE:** 11/30/2014

**EQUIPMENT DESCRIPTION:**

LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOT MODEL 60BV36 BAGHOUSE AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
3. PM10 emissions from the dust collector serving the railcar pneumatic conveyance system shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the dust collector serving the truck unloading operation shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The maximum throughput for the railcar unloading shed shall not exceed either of the following limits: 432 tons of material per day or 0.0035 lb PM10/ton of material. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from the railcar unloading shed shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from the exhaust of the dust collector(s) serving the truck unloading and railcar conveyance operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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



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# ATTACHMENT C

Detailed Facility List

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### Detailed Facility Report

For Facility=705 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

<b>J R SIMPLOT COMPANY</b>		<b>FAC #</b>	<b>C 705</b>	<b>TYPE</b>	<b>TitleV</b>	<b>EXPIRE ON:</b>
12688 S COLORADO AVE		<b>STATUS:</b>	<b>A</b>	<b>TOXIC ID:</b>	<b>40139</b>	<b>AREA:</b>
HELM, CA 93627		<b>TELEPHONE:</b>	<b>5598665681</b>			<b>INSP. DATE:</b>
						<b>11/30/2019</b>
						<b>3/314</b>
						<b>08/16</b>

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-705-1-10	71.4 MMBTU/HR U.I.W. BOILER	3020-02 H	1	1,080.00	1,080.00	A	71.4 MMBTU/HR UNION IRON WORKS MODEL SPG-50FS NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM AND FLUE GAS RECIRCULATION (FGR) SYSTEM
C-705-2-3	469.0 HP I.C. ENGINE	3020-10 D	1	502.00	502.00	A	469 BHP (INTERMITTENT) CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR
C-705-3-14	50.3 MMBTU/HR NITRIC ACID PLNT	3020-02 H	1	1,080.00	1,080.00	A	NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH3 TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER
C-705-4-10	1230.0 HP #3 PHOS ACID PLANT	3020-01 G	1	855.00	855.00	A	CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS
C-705-5-9	167.5 hp	3020-01 D	1	330.00	330.00	A	LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.
C-705-6-3	190.0 HP AMMO-NITRATE PLANT	3020-01 D	1	330.00	330.00	A	190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER
C-705-10-3	157 HP DIESEL-FIRED IC ENGINE	3020-10 B	1	123.00	123.00	A	157 BHP (INTERMITTENT) PERKINS MODEL PDFP-L6YW-2506 DIESEL-FIRED EMERGENCY IC ENGINE DRIVING A FIRE WATER PUMP
C-705-11-3	121.0 HP UNLOADING OPERATION	3020-01 D	1	330.00	330.00	A	MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS
C-705-12-3	122.5 HP UNLOADING OPERATION	3020-01 D	1	330.00	330.00	A	AMMONIUM SULFATE AND UREA DRY FERTILIZER STORAGE AND UNLOADING OPERATION INCLUDING FOUR BELT CONVEYORS, TWO BUCKET ELEVATORS, TWO SHUTTLE CONVEYORS, CONDITIONER, AND SEVEN BLOW PIPES.
C-705-13-3	72.5 HP UNLOADING SHED	3020-01 C	1	207.00	207.00	A	72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER
C-705-14-5	1200 hp Detroit Diesel engine	3020-10 F	1	785.00	785.00	A	1,200 BHP (INTERMITTENT) DETROIT DIESEL MODEL R163-7K35 (16 V-2000) TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

**Detailed Facility Report**

For Facility=705 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-705-15-2	125 HP	3020-01 D	1	330.00	330.00	A	LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOT MODEL 60BV36 BIN VENT FILTER AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

Number of Facilities Reported: 1

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# ATTACHMENT D

J R Simplot Company Comments and  
District Responses

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## J R Simplot Company Comments and District Responses (Draft):

The District received the following two comments from J R Simplot Company on October 22, 2015 that are listed below along with District's responses.

### Comment #1

On page 22 of the Title V Permit Renewal Evaluation, please change Section F to read:

*"Since the existing compression ignited IC engines C-705-2, '-10 and '-14 at this facility do not qualify for any of the exemptions listed in 40 CFR part 63, subpart ZZZZ §63.6590(c)(1) thru (c)(7), they are not subject to ~~this subpart 40 CFR 60 Subpart IIII~~ and instead are subject to 40 CFR part 63, subpart ZZZZ."*

### Draft District's Response to Comment #1

This comment is to clarify the discussion for 40 CFR Part 60, Subpart IIII under Section F of the Title V permit renewal evaluation. The District concurs that changing the reference of "this subpart" to "40 CFR 60 Subpart IIII" will clarify the discussion. Therefore, the paragraph has been revised accordingly to read as follows:

*"Since the existing compression ignited IC engines C-705-2, '-10 and '-14 at this facility do not qualify for any of the exemptions listed in 40 CFR part 63, subpart ZZZZ §63.6590(c)(1) thru (c)(7), they are not subject to 40 CFR 60 Subpart IIII and instead are subject to 40 CFR part 63, subpart ZZZZ."*

### Comment #2

In the renewed Permit C-705-3-14, item 12, requires our NOx monitor to comply with 40 CFR 5I Appendix P.

If you refer to the definition of affected facility in part 51, it is for facilities greater than 300 TPD which is greater than our annual average daily production capacity. Since Appendix P is not applicable to our Nitric Acid Plant, please remove this reference from Permit C-705-3-14.

### Draft District's Response to Comment #2

Appendix P of 40 CFR Part 51 — *Minimum Emission Monitoring Requirements* — states the minimum requirements for continuous emission monitoring and recording for the affected facilities that are listed in paragraph 1.1 of Appendix P.

Paragraph 1.1.4 of Appendix P states that the nitric acid plants, as specified in paragraph 2.2 of Appendix P, shall be monitored for nitrogen oxides emissions.

Paragraph 2.2 of Appendix P states that each nitric acid plant of greater than 300 tons per day production capacity, the production capacity being expressed as 100 percent acid, located in an Air Quality Control Region where the Administrator has specifically determined that a control strategy for nitrogen dioxide is necessary to attain the national standard shall install, calibrate, maintain, and operate a continuous monitoring system for the measurement of nitrogen oxides which meets the performance specifications of paragraph 3.1.2 for each nitric acid producing facility within such plant.

As indicated in project C-1080713, permit unit C-705-3 is a 200 TPD model D M Weatherly Nitric Acid Plant and is capable of production up to 300 TPD 100% nitric acid. However, the mechanical limit of the plant configuration is to produce up to 280 TPD of 100% nitric acid. Therefore, permit unit C-705-3 is not subject to Appendix P requirements of Part 51 and condition #12 of the renewed permit C-705-3-14 can be revised as follows to remove reference of Appendix P:

12. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR ~~Part 51, Appendix P,~~ and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080]