



MAY 17 2019

Mr. David Rocha
Baker Commodities, Inc.
PO Box 416
Kerman, CA 93630

Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)
Facility Number: C-72
Project Number: C-1183435

Dear Mr. Rocha:

The Air Pollution Control Officer has issued Authority to Construct (ATC) C-72-11-0 with a Certificate of Conformity to Baker Commodities, Inc. at 16801 W Jensen Ave, Kerman. The modification consists of the installation of a new 30.3 MMBtu/hr natural gas-fired boiler with low-NOx burner and Selective Catalytic Reduction (SCR) system. Enclosed are the ATC and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ATC was published on April 16, 2019. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on April 9, 2019. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Prior to operating with the modifications authorized by the ATC, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms are found on the District's website at www.valleyair.org/permits/TVforms.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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

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

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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,

A handwritten signature in cursive script that reads "Arnaud Marjollet". The signature is written in black ink and is positioned above a horizontal line.

Arnaud Marjollet
Director of Permit Services

Enclosures

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



AUTHORITY TO CONSTRUCT

PERMIT NO: C-72-11-0

ISSUANCE DATE: 05/16/2019

LEGAL OWNER OR OPERATOR: BAKER COMMODITIES, INC

MAILING ADDRESS: PO BOX 416
KERMAN, CA 93630

LOCATION: 16801 W JENSEN AVE
KERMAN, CA 93630

EQUIPMENT DESCRIPTION:

30.3 MMBTU/HR HURST MODEL S500-X-800-150 (OR EQUIVALENT) NATURAL GAS-FIRED BOILER WITH AN OILON MODEL GP-700 M-III LN80 (OR EQUIVALENT) LOW-NOX BURNER AND CATASTAK MODEL FT (OR EQUIVALENT) SELECTIVE CATALYST REDUCTION (SCR) SYSTEM

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOx emission reduction credits for the following quantity of emissions: 1st quarter - 345 lb, 2nd quarter - 346 lb, 3rd quarter - 346 lb, and 4th quarter - 345 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number S-4641-2 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

C-72-11-0 : May 16 2019 9:09AM - AHMADS : Joint Inspection NOT Required

5. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
8. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
11. This unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. 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
13. 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]
14. The total duration of startup and shutdown time shall not exceed any of the following limits: 2.0 hours startup per day, 2.0 hours shutdown per day, or 104 hours total startup and shutdown time per year. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. During startup and shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. During startup and shutdown periods, emissions from natural gas combustion shall not exceed any of the following limits: 35 ppmv NO_x @ 3% O₂ or 0.0425 lb-NO_x/MMBtu; 0.00285 lb-SO_x/MMBtu; 0.003 lb-PM₁₀/MMBtu; 10 ppmv CO @ 3% O₂ or 0.0074 lb-CO/MMBtu; or 16 ppmv VOC @ 3% O₂ or 0.0068 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Except during startup and shutdown, emissions from natural gas combustion shall not exceed any of the following limits: 2.5 ppmv NO_x @ 3% O₂ or 0.003 lb-NO_x/MMBtu; 0.00285 lb-SO_x/MMBtu; 0.003 lb-PM₁₀/MMBtu; 10 ppmv CO @ 3% O₂ or 0.0074 lb-CO/MMBtu; or 16 ppmv VOC @ 3% O₂ or 0.0068 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. NH₃ emissions from the SCR system shall not exceed 10 ppmvd @ 3% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Source testing to measure steady state NO_x, CO, and NH₃ emissions from this unit shall be conducted within 60 days of initial startup. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Source testing to measure natural gas combustion NO_x, CO, and NH₃ emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests when unit is fired on natural gas, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
26. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 2201] Federally Enforceable Through Title V Permit
27. 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
28. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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, and 4320] Federally Enforceable Through Title V Permit
30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH₃ 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 and 4320] Federally Enforceable Through Title V Permit
32. If the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the 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 and 4320] Federally Enforceable Through Title V Permit

33. All NO_x, CO, O₂ 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_x, CO and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
34. Ammonia emission readings shall be conducted at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
36. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
37. The permittee shall maintain records of the amount of fuel combusted during each calendar month in this unit. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
38. Daily and annual records of start-up and shutdown durations and number of occurrences of each shall be kept. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
39. 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, 2201, 4305, 4306 and 4320, and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit