



JAN 19 2011

Mr. Tim Van Domelen
J.R. Simplot Company
P.O. Box 198
Lathrop, CA 95330

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # N-1102757**

Dear Mr. Van Domelen:

The Air Pollution Control Officer has issued an Authority to Construct (N-767-9-14) with a Certificate of Conformity to J.R. Simplot Company. Modification of the sulfuric acid production plant to include permit conditions to address, respond, and report fugitive sulfur compound leak emissions and to clarify that on the associated permit condition that the sulfur compound emissions concentration limit of 0.2% by volume or 2,000 ppmv per Rule 4801 to only apply at the sulfuric acid plant exhaust stack.

Enclosed is the Authority to Construct and invoice. The application and proposal were sent to US EPA Region IX on November 12, 2010. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW: KC/cm

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

JAN 19 2011

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # N-1102757**

Dear Mr. Rios:

The Air Pollution Control Officer has issued an Authority to Construct (N-767-9-14) with a Certificate of Conformity to J.R. Simplot Company. Modification of the sulfuric acid production plant to include permit conditions to address, respond, and report fugitive sulfur compound leak emissions and to clarify that on the associated permit condition that the sulfur compound emissions concentration limit of 0.2% by volume or 2,000 ppmv per Rule 4801 to only apply at the sulfuric acid plant exhaust stack.

Enclosed are copies of the Authority to Construct. The application and proposal were sent to US EPA Region IX on November 12, 2010. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
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AUTHORITY TO CONSTRUCT

PERMIT NO: N-767-9-14

ISSUANCE DATE: 01/10/2011

LEGAL OWNER OR OPERATOR: J R SIMPLOT COMPANY

MAILING ADDRESS: PO BOX 198
LATHROP, CA 95330

LOCATION: 16777 S. HOWLAND ROAD
LATHROP, CA 95330

EQUIPMENT DESCRIPTION:

MODIFICATION OF SULFURIC ACID PRODUCTION PLANT CONSISTING OF A SULFUR FURNACE WITH A 15.0 MMBTU/HR SUR-LITE CORP. MODEL 6-H250 TT PRE-HEAT FURNACE BURNER, TWO CONVERTERS, SIX WASTE HEAT RECOVERY BOILERS, A DRYING TOWER WITH AN ENTRAINMENT SEPARATOR, AN INTERSTAGE ABSORPTION TOWER WITH A MIST ELIMINATOR, A FINAL TOWER WITH A MIST ELIMINATOR, AND ASSOCIATED EQUIPMENT TO INCLUDE PERMIT CONDITIONS TO ADDRESS, RESPOND, AND REPORT FUGITIVE SO2 LEAKS WHICH OCCUR DURING PLANT STARTUP, SHUTDOWN, OR OTHER UPSET CONDITIONS. THE APPLICANT IS ALSO PROPOSING TO CLARIFY ON THE ASSOCIATED PERMIT CONDITION THAT THE SULFUR COMPOUND EMISSIONS CONCENTRATION LIMIT OF 0.2% BY VOLUME OR 2000 PPMV PER RULE 4801 TO ONLY APPLY AT THE SULFURIC ACID PLANT EXHAUST STACK.

CONDITIONS

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]
2. 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 (11/15/01). 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201 and 4202] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadfedin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-767-9-14: Jan 10 2011 9:10AM - CHANK : Joint Inspection NOT Required

4. The overall oxides of sulfur emissions as SO₂ from the sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 4 pounds per ton of 100% sulfuric acid produced except during periods of start-up and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The overall oxides of sulfur emissions as SO₂ from the sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 21.5 pounds per ton of 100% sulfuric acid produced during periods of start-up and shutdown. This performance based limit is to enforce the SO_x emission reductions granted by certificate N-74-5. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Emissions of oxides of sulfur as SO₂ from the entire sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 2,461 pounds during any one day. This performance based limit is to enforce the SO_x emission reductions granted by certificate N-75-5. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions from the sulfuric acid plant exhaust stack shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Rule 407 (San Joaquin)] Federally Enforceable Through Title V Permit
8. The oxides of sulfur emissions as SO₂ from the sulfuric acid plant shall be determined using the procedures specified in 40 CFR 60.84. [District Rule 2201 & NSPS Subpart H] Federally Enforceable Through Title V Permit
9. The Sur-Lite Corp. furnace igniter burner shall only be fired on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Heat input to the Sur-Lite Corp. furnace igniter burner shall not exceed 21,000 MMBtu in any one rolling 12 month period. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The Sur-Lite Corp. furnace igniter burner shall be equipped with an operational non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the igniter burner or other District approved alternative. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions from the Sur-Lite Corp. furnace igniter burner shall not exceed any of the following limits: 0.061 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.005 lb-PM₁₀/MMBtu, 0.035 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. A source test for oxides of sulfur shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The results of each test shall be submitted for District evaluation no later than 60 days following each test. [District Rule 1081] Federally Enforceable Through Title V Permit
15. A pretest plan indicating the methods, procedures and operational parameters shall be submitted for District approval no later than 30 days prior to each test. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Source testing to measure concentrations of oxides of sulfur shall be conducted using either CARB Method 6, CARB Method 8, CARB Method 100, EPA Method 6, or EPA Method 8. [District Rule 1081] Federally Enforceable Through Title V Permit
17. Source testing to measure stack gas flow rate, moisture content, and oxygen content shall be conducted using EPA Methods 1 thru 4. [District Rule 1081] Federally Enforceable Through Title V Permit
18. An hourly log of sulfuric acid produced by each process line shall be kept on the premises at all times and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
19. The permittee shall provide, properly install and maintain in proper working order, continuous monitoring and recording systems to measure oxides of sulfur emissions as SO₂. [District Rule 1080, 5.2.1] Federally Enforceable Through Title V Permit
20. The averaging time for the SO₂ emission monitoring system shall not exceed 15 minutes. [District Rule 2080] Federally Enforceable Through Title V Permit
21. All continuous monitoring and recording instruments shall be installed, calibrated and operated in accordance with the requirements of 40 CFR 60.84. [District Rule 1080, 6.1.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall submit a written report for each calendar quarter to the District no later than 30 days following the end of each calendar quarter. The report shall comply with all of the requirements of the District rules. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
23. The sampling probe of the Dupont 460 photometric analyzer system shall be replaced with a clean probe at least once per month to prevent emission data gaps due to probe failure. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Invalid SO₂ emission readings caused by the changing of the probe shall not exceed a period of two hours for each probe change. [District Rule 2080] Federally Enforceable Through Title V Permit
25. A written log indicating the date and time of each probe change shall be kept on the premise and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
26. The facility shall not discharge into the atmosphere any gases which contain acid mist, expressed as sulfuric acid, in excess of 0.3 pounds per ton of 100% sulfuric acid produced. [District Rule 4802] Federally Enforceable Through Title V Permit
27. Source testing to measure sulfuric acid mist using EPA Method 8 of 40 CFR 60 Appendix A shall be conducted on an annual basis. [District Rule 2520, 9.3.2 and District Rule 4201] Federally Enforceable Through Title V Permit
28. 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, 9.0] Federally Enforceable Through Title V Permit
29. 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 8 hours after the breakdown is detected. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
30. The continuous SO₂ 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, 6.5] Federally Enforceable Through Title V Permit
31. Visible emissions shall be inspected weekly 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, 9.3.2] Federally Enforceable Through Title V Permit
32. The facility shall visually inspect for sulfur compound leaks at the sulfuric acid plant ducting and equipment each work shift when the plant is operating. Daily records shall be maintained to verify that a leak inspection was performed during each work shift. [District Rule 4102]
33. All sulfur compound leaks at the sulfuric acid plant ducting or equipment shall be reported to the District within 24 hours of detection. All leaks shall be repaired within 24 hours of detection. If the sulfur compound leaks cannot be repaired within 24 hours of detection, the plant shall be shut down until the leaks are repaired. [District Rule 4102]
34. For each sulfur compound leak occurrence, maintain a record indicating the following: (a). Date and time when the sulfur compound leak occurred; (b). Description (i.e. shape, size, type of leak, etc.) and location (relative to the nearest ductwork or equipment) of the sulfur compound leak; (c). Length of time to repair the sulfur compound leak (in minutes or hours); (d). The quantity of sulfur compound emissions from the leak (in pounds per hour); (e). The total quantity of plant sulfur compound emissions (in pounds per day) indicating whether excess emissions occurred due to the leak. [District Rule 4102]
35. The permittee shall maintain a record of the cumulative annual fuel heat input to the Sur-Lite Corp. furnace igniter burner. The cumulative total shall be updated at least monthly. The fuel heat input can be calculated by multiplying the amount of natural gas fuel combusted (in scf) by a heating value of 1,000 Btu/scf. [District Rules 1070 & 2201] Federally Enforceable Through Title V Permit
36. 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 Rule 1070] Federally Enforceable Through Title V Permit
37. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

38. 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
39. Authority to Construct (ATC) permit N-767-9-13 shall be implemented prior to the implementation of this ATC permit. [District Rule 2201] Federally Enforceable Through Title V Permit