

FRITO-LAY, INC. - CASA GRANDE

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1. Introduction

This Title V permit, as revised in this document, pertains to an existing snack food processing and packaging operation, owned and operated by Frito-Lay, Inc. a Delaware corporation. The SIC Code is 2096. The facility is located at 1450 W. Maricopa Highway, Casa Grande, Pinal County, Arizona, upon a parcel also identified by Pinal County Assessor's Parcel # 503-35-001-A6. The source is situated in an area classified as "attainment" for all pollutants.

The facility includes 5 processing lines for the different types of products that Frito-Lay manufactures: Sun Chips, corn chips, tortilla chips, potato chips and fried cheese puffs. Besides the grain receiving and handling and grain milling, the different lines require steam for kettles, fryers and dryers¹. The existing heating equipment has historically only been allowed to burn natural gas or propane.

This Title V permit newly authorizes the use of a 78.3 MMBtu/hr biomass-fueled boiler to generate steam. The existing 79.2 MMBtu/hr natural gas boiler will be kept to supplement or as backup for the biomass boiler. The biomass boiler will include a fuel handling system consisting of the following process:

1. "Wood waste" will be the primary source of fuel and will be delivered via covered tractor trailer into a concrete bunker. The wood waste will arrive on site pre-screened and pre-chipped so there will be no wood processing at the facility.
2. Tire Derived Fuel ("TDF") will also be delivered to the facility via dump truck into a TDF bin.
3. The wood fuel will be transported by a drag chain through a sifter screen to remove any large debris.
4. The wood fuel will be conveyed by an incline belt where it will be combined with the TDF as needed.
5. The biomass fuel (wood + TDF) will pass through a magnet conveyor near the end of the incline belt which is designed to remove any residual ferrous metals which could still be present on the fuel source and which could generate toxics.
6. The fuel will drop into a hopper before it enters the boiler.

"Wood waste" can include wood waste from demolished buildings, wood pallets, green wood waste: tree clippings, limbs and cuttings, forest product waste and bark; sawdust and sanderdust, and pelletized grass and leaves. Wood waste will contain less than 1% total by weight of any or any combination of the following contaminants: plastics, rubber, glass, painted wood (possibly including paint containing lead), chemically treated wood (e.g., chromium, copper, arsenic, creosote, or pentachlorophenol), metals and salts. The TDF will be limited to 7% of the total fuel source heat input annually.

Fly ash will be generated by the biomass boiler. In order to minimize fugitive emissions from the handling of fly ash, Frito-Lay will collect the ash in a containerized system. The ash container will then be loaded in a truck via a lift system and properly discarded.

Frito-Lay will install a multi-clone/electrostatic precipitator (ESP) system to control particulate matter (PM10) stack emissions from the biomass boiler and a Selective Catalytic Reduction system which in the future will be used to control emissions of nitrogen oxides (NOx).

In addition to the new biomass boiler and the existing natural gas boiler, the existing source also includes two (5.383 MM BTU/hr) natural-gas fired ovens. Besides Particulate Matter (PM10) emissions, typical products of combustion (Nitrogen Oxides, Carbon Monoxide, Volatile Organic Compounds and Sulfur Dioxide) are generated from these equipment. Additional PM10 emissions arise from equipment used for handling product ingredients and frying products.

This revision also incorporates a seasoner (On-Machine Seasoning system) which has been installed on the Sun Chips line but has not been previously permitted.

With this revision this source constitutes a "major source" for nitrogen oxides and carbon monoxide within the meaning of CAA §302(j), the facility requires an operating permit under CAA §501 *et seq.*

The biomass boiler is subject to the requirements of 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

¹The different lines are explained more in-depth in the Technical Support Document ("TSD") for this permit.

A complete list of equipment from which emissions are allowed by this permit is given in Section 8 of this permit. For additional information, see the "Technical Support Document" for this permit, which outlines the facility configuration, operation, emissions, permitting history and other information.

2. Listing of (*Currently Federally Enforceable*) Applicable Requirements

- A. Those specific provisions of the Pinal-Gila Counties Air Quality Control District ("PGAQCD") Regulations, as adopted by the Pinal County Board of Supervisors on March 31, 1975, and approved by the Administrator as elements of the Arizona State Implementation Plan ("SIP") at 43 FR 50531, 50532 (11/15/78), and specifically the following rules:

7-3-1.1	Emission Standards - Particulates - Visible Emissions - General
7-3-1.2	Emission Standards - Particulate Emissions - Fugitive Dust
7-3-5.1	NOx Emissions - Fuel Burning Equipment

- B. Those specific provisions of the Pinal-Gila Counties Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on June 16, 1980, and approved by the Administrator as elements of the Arizona SIP at 47 FR 15579 (4/12/82), specifically, the following rules:

7-3-1.1	Visible Emissions; General
7-3-1.7.F	Fuel Burning Equipment

- C. Those specific provisions of the Pinal County Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on October 27, 2004, and approved by the Administrator as elements of the Arizona SIP at 75 FR 17307, specifically, the following rules:

4-2-040	(Reasonable Precautions) Standards
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- C. 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
- D. National Emission Standards for Hazardous Air Pollutants for Asbestos, 40 CFR Part 61, Subpart M [40 CFR §§61.140- 61.157].
- E. Stratospheric Ozone and Climate Protection, 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction [40 CFR §82.150-82.166].
- F. New Source Performance Standards, General Provisions, 40 CFR Part 60, Subpart A [40 CFR §60.1-60.10, 60.12-60.17, 60.19]
- G. CAA §112(r) (11/15/90); 40 CFR Part 68 (7/31/98); Chemical Accident Prevention Provisions

3. Compliance Certification

- A. Compliance Plan [*Mandated by 40 CFR §70.5(c)(8)*] (Code §§3-1-081.C, 3-1-083.A.7)

Since the Permittee has certified that it is currently in compliance, the compliance plan consists of continued adherence to the requirements of this permit.

- B. Compliance Schedule [*Mandated by 40 CFR §§ 70.5(c)(8), 70.6(c)(3)*] [40 CFR 63.6(i)(6)(B)] (Code §§3-1-060.B.1, 3-1-083.A.7.c)

Insofar as the Permittee is currently in compliance, no compliance schedule to attain compliance is required.

4. Authority to Construct Federally Enforceable Minor-NSR Permit-Based Limitations -[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)] (Code §3-1-081.A)

- A. Generally

This permit section sets forth "applicable requirements" founded upon the federally enforceable provisions of prior "permits to construct." Other than as defined in this section, emission units at this facility are "grandfathered," and are not subject to limitations arising only from limitations defined in prior permits. Nonetheless, all emission units do fall subject to relevant Regulatory Emission Limitations, as defined elsewhere in this permit.

B. Old Permit-based Minor NSR Limitations [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-081.A)

1. Particulate Matter (PM10) Emissions

a. Process Controls

- i. When the potato chip fryer is operating, the scrubber shall be operated to remove particulate matter emissions to the maximum practical extent.
- ii. Primary and secondary seasoning to the fried potato chips shall be applied by means of a self-contained mechanical seasoners.
- iii. When the corn cleaning system is operating, the baghouse shall be operated to remove particulate matter emissions to the maximum practical extent.
- iv. During the corn chip fryer operation, a high efficiency oil-mist eliminator shall be operated.
- v. Seasoning to the fried corn products shall be applied by means of a mechanical seasoner.
- vi. During the tortilla chip fryer operation, a high efficiency oil-mist eliminator shall be operated.
- vii. Seasoning to the fried tortilla products shall be applied by means of a mechanical seasoner.
- viii. When the wheat cleaning system is operating, the baghouse shall be operated to remove particulate matter emissions to the maximum practical extent.
- ix. During Sun Chips hammermill operation, Roto-Clone (AAF) shall be operated to draw steam and moisture off the hammermill to the outside of the building.
- x. During Sun Chips fryer operation, the high efficiency oil mist eliminator shall be operated to recover process oil from the exhaust stream.
- xi. Dust collected by the baghouse shall be discharged into closed containers or flexible skirting shall be used on the discharge to minimize emissions.

b. Operational Limitations

Permittee shall only use dried and precleaned corn in the tortilla chip line and the corn chip line.

C. New Permit-based Minor NSR and HAP Limitations [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-081.A)

1. PM10 and PM2.5 Minor Source Status

a. Emission Caps; Particulate Matter (PM10 and PM2.5)

Permittee shall limit the facility-wide PM10 and PM2.5 emissions in any twelve-month period to 90 tons.

b. Control Requirements

i. Permittee shall install, maintain and operate mechanical collectors (multiclone) in series with an electrostatic precipitator (ESP) to control particulate matter emissions from the biomass boiler exhaust.

ii. Permittee shall install, maintain, and operate a voltmeter to measure the secondary voltage across the electrostatic precipitator on a continuous basis and shall record the output of the system.

iii. Permittee shall operate the ESP at the manufacturer's recommended voltage until the first approved performance test report². After such test, the ESP shall be operated at the voltage recorded during the performance test.

iv. Permittee shall install, maintain, and operate a manometer or another similar device to measure the pressure drop across the multiclone.

v. Permittee shall operate the multiclone at the manufacturer's recommended pressure drop range until the first approved performance report. After such test, the multiclone shall be operated at the pressure drop range recorded during the performance test.

c. Operational Limitations

Any fly ash generated collected from the multiclone, ESP and boiler and transported via enclosed conveyors to be stored in a collection bin with a tarp until it is shipped off-site to minimize fugitive emissions.

2. HAPs Synthetic Minor Source Status

a. Emission Caps

i. Permittee shall limit the facility-wide HAP emissions in any twelve-month period to 9 tons of any single HAP or 22.5 tons of a combination of HAPs.

ii. Permittee shall not cause to be discharged into the atmosphere from the boiler stack, including emissions generated during start-ups and shutdowns, total hazardous air pollutant emissions in excess of 0.038 lb/MMBtu.

iii. Permittee shall not cause to be discharged into the atmosphere from the boiler stack, including emissions generated during start-ups and shutdowns, emissions of any single hazardous air pollutant in excess of 0.019 lb/MMBtu.

b. Fuel Limitations

i. Permittee shall not exceed a maximum heat input of 685,908 MMBtu (High Heating Value-dry basis), based on all fuels, for any consecutive

²While the facility is subject to the CAM requirements under 40 CFR Part 64, in accordance with §64.5 they are not required to submit a CAM plan until their application for permit renewal is due.

12-month period.

- ii. Permittee shall not burn more than 4.24 tons of TDF per day in the biomass boiler as measured by the method described in §6.1.A of this.

c. Biomass Boiler Fuel Type

Permittee may burn fuels meeting the following standards:

- i. TDF
 - (a) TDF shall comply with the ASTM Active Standard D6700-01 and be shredded. A certification from the TDF suppliers indicating compliance with such standard shall be kept on site.
 - (b) Whole tires shall not be accepted at the facility from the fuel suppliers.
- ii. Allowable Biomass Pre-Chipped Wood
 - (a) Wood from demolished buildings;
 - (b) Wood pallets;
 - (c) Green wood waste: tree clippings, limbs and cuttings, forest product waste, and bark;
 - (d) Sawdust and sanderdust;
 - (e) Pelletized grass and leaves (yard waste);
 - (f) Landscape maintenance;
 - (g) As certified by the supplier, less than 1% total by weight of any or any combination of the following contaminants: plastics, rubber, glass, painted wood, chemically treated wood (e.g., chromium, copper, arsenic, creosote, or pentachlorophenol), metals and salts.
- iii. Prohibited Biomass Fuels: Except as indicated in subsection ii.(g) above:
 - (a) Wood that has been treated with creosote, pentachlorophenol or arsenic.
 - (b) Wood that is tainted with paints, glues, adhesives, and binders.
 - (c) Particle board or plywood.

d. Fuel Supplier Certifications

To limit emissions of HAPs, Permittee shall only accept biomass fuel from suppliers who have signed a certification in accordance with subsection iii below. Records of certification for each supplier must be kept on-site.

- i. Permittee shall prepare and maintain Fuel Specifications pertaining to biomass fuel in accordance with the requirements of the “Biomass Boiler Fuel Type” section above and shall require the suppliers to certify in writing that the fuel shipments to Frito-Lay shall comply with such Fuel Specification.

- ii. To ensure compliance with the acceptance plan, Permittee shall post signs in the receiving area of the facility notifying suppliers of the items not accepted, and giving notice of the requirement for a signed certification of compliance.
- iii. Every certification required under this section shall include the following language:

“I certify that the materials delivered comply with the Fuel Specification for this facility. I understand that these assertions are material to the protection of public health and the preservation of air quality. The undersigned under oath or affirmation knowingly attests as to the truth of what is stated, and acknowledges that any false statement shall be subject to prosecution under A.R.S. §13-2703 and based on information and belief formed after reasonably inquiry, the statements and information in the document are true, accurate and complete .”
- iv. Permittee shall conduct visual inspections of fuel shipments and identify any materials that are considered unacceptable by the Fuel Acceptance Plan.
- e. Operational Limitations
 - i. The fuel handling system for the biomass boiler shall be equipped with a magnet cleaning conveyor designed to remove ferrous metals from the fuel sources before they enter the boiler.
 - ii. TDF System Conveyor Belt

Permittee shall install equip the TDF conveyor belt with a Variable Frequency Drive in order to establish a TDF inventory.

5. Emission Standards, Limitations and Controls [Code §3-1-081.A.2 (Nov. '93)]

A. Applicable Limitations (Code §3-1-082)

Where different standards or limitations apply under this permit, the most stringent combination shall prevail and be enforceable.

B. Allowable Emissions (Code § 3-1-081.A.2.)

The owner/operator ("Permittee") is authorized to discharge or cause to discharge into the atmosphere those emissions of air contaminants as set forth in this permit. Unless exempted under Code §3-2-180, Permittee shall not use any material, process, or equipment not identified in this permit which will cause emissions of any regulated air pollutant in excess of the 5.5 pound-per-day *de minimis* amount, unless authorized by a permit revision under as allowed under this permit, or by a separate permit issued by the District or other competent authority.

C. Performance Standards for Biomass Boiler - NSPS Subpart Dc [*Federally Enforceable*] [40 CFR §§60.43c(c), 60.43c(e)(1), 60.42c(d)](Code §6-1-030.5)

1. On and after the date on which the initial performance test is completed or required to be completed under 40 CFR §60.8 and this permit, whichever date comes first, the Permittee shall not discharge into the atmosphere any gases that contain PM in excess of 0.030 lb/MMBtu heat input.
2. On and after the date on which the initial performance test is completed or required to be completed under 40 CFR §60.8 and this permit, whichever date comes first, the Permittee shall not cause to be discharged into the atmosphere from the biomass boiler gases that exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour

of not more than 27% opacity.

3. The heat input and opacity standards apply at all times, except during periods of startup, shutdown or malfunction.

D. Particulate Emissions - Opacity Limits [*Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP element at 47 FR 15579 (4/12/82)*] (Code §§2-8-300. and 4-2-040.)

1. SIP Limitation - [*Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP element at 47 FR 15579 (4/12/82)*] (Code §§2-8-300. and 4-2-040.)

The opacity of any plume or effluent shall not be greater than 40 percent as determined by Reference Method 9 in the Arizona Testing Manual (ADEQ, 1992). Nothing in this limitation shall be interpreted to prevent the discharge or emission of uncontaminated aqueous steam, or uncombined water vapor, to the open air.

2. Locally Enforceable Limitation (Code §2-8-300)

The opacity of any plume or effluent from any point source not subject to a New Source Performance Standard adopted under Chapter 6 of the Code, and not subject to an opacity standard in Chapter 5 of the Code, shall not be greater than 20% as determined in Method 9 in 40 CFR Part 60, Appendix A. Affected facilities include the natural gas boiler, starch dryer, the two tortilla chip ovens and product lines.

3. Bulk Fuel and Fly Ash Handling (Voluntarily Accepted Limitation)

The opacity of any plume or effluent generated at any transfer point during handling of the fuel or fly ash shall not be greater than 10 percent as determined by EPA Reference Method 9 **AND** not greater than 20 percent as determined by EPA Reference Method 203C.

E. Emission Limitations - Particulate Matter [*Currently federally enforceable pursuant to PGCAQCD Reg. 7-3-1.7 (3/31/75) approved as a SIP Element at 43 FR 50531 (11/15/78)*] (Code §3-1-081., §5-24-1032)

1. For process sources having a weight rate of 60,000 pounds per hour (30 tons per hour) or less, the maximum allowable emission shall not exceed:

$E = 4.10P^{0.67}$, where E = maximum allowable particulate matter emissions rate in lb/hr, and P = process weight in tons/hour.

2. The total process weight from all similar units employing a similar type process shall be used in determining the maximum allowable emission of particulate matter.

F. Particulate Emissions - Control of Fugitive Dust [*Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.2 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)*]

Permittee shall not cause, suffer, allow or permit a building or its appurtenances or open area to be used, constructed, repaired, altered or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Particulate emissions shall be kept to a minimum by such measures as wetting down, covering, landscaping, paving, treating or by other reasonable means.

G. Particulate Matter Reasonable Precautions [*Currently federally enforceable pursuant to PCAQCD Reg. 4-2-040 (4/27/04) approved as a SIP element at 75 FR 17307*]

1. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, or fill dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.

2. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
3. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
4. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
5. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.
6. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other material that is tracked out or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits.

H. Emissions Limitations - Sulfur Dioxide and Nitrogen Oxide (Code §5-24-1030)

Permittee shall not cause the emission of pollutants at rates greater than the following:

1. Sulfur Dioxide (SO₂) - 600 ppm
2. Nitrogen Oxides expressed as NO₂ - 500 ppm

I. Other Fuel Use Limitations [Code §§3-1-081 & 5-23-1010.F.]

1. Primary and Secondary Fuels

Permittee is allowed to burn natural gas as the primary fuel and propane as a secondary fuel in the 79.2 MMBtu/hr boiler, starch dryer, propane flare and the two tortilla chip ovens.

2. Nitrogen Oxides (NO_x) Emissions - Operational Limitation

Permittee shall limit the aggregate operation of the equipment run on propane including the boiler (79.2 MM Btu/Hr), starch dryer (0.41 MM Btu/Hr), propane flare (1.5 MM Btu/Hr) and the two tortilla chip ovens (5.383 MM Btu/Hr each) in any 12 month rolling average period to 2160 hours each.

3. Other Fuels (Code §§3-1-081.G)

The Permittee shall not burn used oil, used oil fuel, hazardous waste, and hazardous waste fuel (as defined in federal, state, or county codes and rules) in the steam generating unit(s) without first obtaining a separate permit or an appropriate permit revision.

J. Additional Applicable Limitations

1. Asbestos NESHAP Compliance [*Currently federally enforceable; 40 CFR Part 61, Subpart M*] (Code §§7-1-030, 7-1-060)

Permittee shall comply with Code §§7-1-030.A. and 7-1-060 and 40 CFR Part 61, Subpart M, when conducting any renovation or demolition activities at the facility.

2. Stratospheric Ozone and Climate Protection [*Currently federally enforceable; 40 CFR Part*

82 Subpart FJ (Code §§1-3-140.15, 1-3-140.58.k)

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

K. Additional Plant-Wide Requirements**1. Sandblasting - Plant Wide** (Code §5-4-160.)

Permittee shall use at least one of the following control measures during sandblasting operations:

- a. Vacuum collection system.
- b. Confined blasting.
- c. Wet abrasive blasting.
- d. Hydroblasting.
- e. A control measure that is determined by the Control Officer to be equally effective to control particulate matter emissions.

2. Architectural Coatings (Code §5-12-370)

Permittee shall not employ, apply, evaporate or dry any architectural coating, as defined in §5-12-370.C, for industrial or commercial purposes, material containing photochemically reactive solvent as defined in §5-9-280 or shall thin or dilute any architectural coating with a photochemically reactive solvent.

3. Other Spray Painting (Code §5-13-390)

Permittee shall conduct spray painting operations except architectural coatings in an enclosed area designed to contain not less than 96% by weight of the overspray. An enclosed area means a 3-sided structure with walls a minimum of 8 feet high.

4. Disposal (Codes §§5-12-370 and 5-13-390)

Permittee shall not, during any one day, dispose of a total of more than one and one-half gallons of any photochemically reactive solvent or of any material containing more than one and one-half gallons of any such photochemically reactive solvent by any means which will permit the evaporation of such solvent into the atmosphere.

5. Cutback and Emulsified Asphalt (Code §5-16-670)

Except as exempted in §5-16-680, Permittee:

- a. Shall not use or apply the following materials for paving, construction or maintenance:
 - i. Rapid cure cutback asphalt;
 - ii. Any cutback asphalt material, road oils or tar which contains more than 1.5% by volume VOCs which evaporate at 500°F or less using ASTM Test Method D-402-76 or more than 27% by volume total solvent in the asphalt binder.
 - iii. Any emulsified asphalt or emulsified tar containing more than 3% by volume VOCs which evaporate at 500°F or less using ASTM Test Method D-244-89.

- b. Shall not store within Pinal County any emulsified or cutback asphalt product which contains more than 1.5% by volume solvent-VOC unless such material lot included a designation of solvent-VOC content on data sheet(s) expressed in percent solvent-VOC by volume.

6. Solvent Cleaning (§5-15-620)

- a. Solvent cleaners/degreasers shall:
 - i. Provide a leak-free container for solvents and articles being cleaned;
 - ii. Except for a remote reservoir cleaner using unheated solvent, be equipped with a cover which prevents the solvent from evaporating when not processing work;
 - iii. Be equipped with a drain configured to return solvent drained from cleaned parts to the container;
 - iv. Be clearly labeled to identify the solvent and explain the proper operation of the cleaner;
 - v. A degreaser/cleaner with a remote reservoir shall be equipped with a sink-like work area sloped sufficiently toward a drain so as to prevent pooling of the solvent, a drain from the sink to the reservoir, with a maximum drain area of 15.5 in², and unless a low-volatility solvent with a boiling point above 248° f is utilized and the solvent is never heated above 120° f., a stopper shall be used to seal the drain opening or a cover placed over the sink when the device is not in use.
 - vi. For a degreaser/cleaner without a remote reservoir, if the degreaser utilizes a low-volatility solvent with a boiling point above 248° f., and the solvent is not agitated in use, Permittee shall maintain a minimum 6" freeboard and keep the cover closed when the apparatus is not in use; or if using solvents which are not low volatility or which are agitated or are heated above 120° F shall have internal drainage and a freeboard ratio of 0.75 or greater; or a water cover may be used to meet the freeboard requirement if the solvent is insoluble in and denser than water; and a cover shall be used that is of a sliding or rolling type which is designed to easily open and close without disturbing the vapor zone. The degreaser/cleaner shall be equipped with a clear and conspicuous mark for the maximum allowable solvent level; and as an alternative to the foregoing freeboard requirement, be equipped with a hood or enclosure with a ventilation rate of no less than 65 cfm per ft.² of evaporative surface, unless a more stringent requirement applies pursuant to OSHA requirements, and the overall control efficiency of emissions from the cleaner, considering both capture and destruction, shall not be less than 85%.
- b. Permittee shall operate the cold solvent cleaners/degreasers in accordance with the operating requirements listed in Code §5-15-620.H. Each cold solvent/degreaser shall have a permanent, conspicuous label which summarizes the relevant operating requirements.

L. Emergency Risk Management and Emergency Response Plan Requirements

1. Chemical Accident Prevention Requirements [Currently federally enforceable; 40 CFR Part 68]

At all times when the facility is subject to 40 CFR Part 68, the permittee shall comply with the planning requirements set forth in 40 CFR Part 68 with regard to the ammonia-handling and ammonia-storage at the facility, as well as any other process or facility affected under 40 CFR Part 68, including:

- a. Submittal of a compliance schedule as required under 40 CFR Part 68, by the date required under 40 CFR §68.10(a); or
- b. As part of the compliance certification submitted under 40 CFR §70.6(c)(5), a

certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a release management plan.

M. General Maintenance Obligation (Code §§3-1-081.E., 8-1-030.A.3)

At all times, including periods of start-up, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate the permitted facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

6. Compliance Monitoring and Recordkeeping [Code §3-1-083 (Nov. '93)]

A. Regular Emissions Monitoring

1. Non-instrumental emissions monitoring

- a. Permittee shall maintain monthly records of the amount of natural gas purchased (in therms);
- b. Permittee shall maintain monthly records of the hours of operation during which propane was used as fuel.
- c. Permittee shall estimate the daily amount of TDF burned by using the Variable Frequency Drive data, and based on the size of the conveyor, TDF density and the speed of the conveyor. Permittee shall maintain records of such estimates.
 - i. Within 60 days of the installation of the conveyor and VFD, Permittee shall submit a report to PCAQCD indicating the design information of the conveyor (size, speed), and showing sample calculations on how they are proposing to calculate the daily amount of TDF burned.
- d. Permittee shall maintain on-site records of TDF supplier documentation certifying that the fuel complies with ASTM Active Standard D6700-01.
- e. Permittee shall calculate and record a monthly MMBtu throughput based on the amount of wood, wood waste and TDF combusted in the boiler and the most recent BTU values determined by §7.D of this section or certified by a supplier and the higher heating value of the TDF.
- f. At the end of each month, Permittee shall calculate and record a twelve month rolling total of the total heat input of the boiler in MMBtu for the previous twelve months. The twelve month total shall be based on the MMBtu throughput calculated in the previous subsection.
- g. Permittee shall maintain Supplier Certifications, including Heating Values for each different Fuel Specification burned in the biomass boiler.
- h. Permittee shall keep records of maintenance of the biomass boiler. Such records shall indicate if the maintenance or operation of the boiler was not conducted in accordance with manufacturer's and a reason.
- i. On a daily basis during operations, Permittee shall conduct a visual observation of the pressure drop across the multiclone and shall make a record of it.
- j. Permittee shall keep records of all fuel deliveries.
- k. At the end of each month, Permittee shall calculate and record a rolling 12-month total of HAP emissions, for both individual and combined HAPs using the emission factors from the most recent performance test and the most recent 12 month rolling total of fuel combusted. Manufacturer's data or AP-42 factors can be used for such

calculations until the first performance test is conducted.

- l. Permittee shall maintain monthly records of the weight of material produced from all five lines which include potato chips line, tortilla chips line, fried cheese puff line, corn chips line and the sun chips line.
 - m. At the end of each month, Permittee shall calculate and record a rolling 12-month of particulate emissions (PM10 and PM2.5) from the facility.
- B. NSPS Opacity Monitoring and Recordkeeping [*Federally Enforceable*][40 CFR §§60.47c(a), 60.47c(b), 60.48c.(b), 60.48c(f)](Code §6-1-030.5)
1. Permittee shall install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) for measuring the opacity of the emissions discharged from the biomass boiler stack to the atmosphere and record the output of the system.
 2. All COMS shall be operated in accordance with the applicable procedures under Performance Specification 1 of Appendix B of 40 CFR 60. The span value of the opacity COMS shall be between 60 and 80 percent.
 3. Permittee shall submit to the District reports of any performance evaluations of the COMS using the applicable performance specifications of Appendix of 40 CFR Part 60.
 4. Permittee shall record and maintain records of the amount of fuel combusted in the biomass boiler during each operating day.
- C. Non-NSPS Opacity Monitoring and Recordkeeping [Code §3-3-260.]
1. General Opacity Monitoring
 - a. On at least a monthly basis, Permittee shall conduct a visual opacity screen on all stacks, process emission points, conveyor transfer points and fugitive sources including storage piles, bulk material handling and ash handling during operations. The individual conducting the opacity screen need not be a certified opacity observer, and the screening need not conform to any EPA reference method.
 - b. Permittee shall keep a record, signed by the observer, showing the date, time and results of the screening.
 - c. If a screening identifies any emissions that may exceed the applicable opacity standard, a certified observer shall conduct a Method 9 and Method 203C, as applicable, observation of the emission point(s) of concern and shall provide a copy of the results to the District within 10 days of first observing the visible emissions.
 - d. Permittee shall conduct full opacity tests every day after the initial one until emissions from that point or exhaust are brought down below the appropriate standard. Results of these reoccurring tests shall also be submitted to the District.
 - e. If any of the Method 9 or Method 203C results indicate that an exceedance of the opacity standard has occurred, it shall be reported in accordance with §8.E of this permit.
- D. Recordkeeping (Code §3-1-083)
- Permittee shall maintain records of:
1. All information required pursuant to any provision of this permit, recorded in a permanent form suitable for inspection.
 2. The occurrence and duration of any start-up, shutdown or malfunction in the operation of the permitted facility or any air pollution control equipment. For purposes of this provision, a

"shut-down" means a cessation of operations at the entire facility for more than seven days, and a "start-up" constitutes the reactivation of the facility after a "shut-down."

7. Testing [Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)] (Code §§3-1-160 & 3-1-170)

A. Generally Applicable Test Program Requirements

Unless specified elsewhere in this permit, all required tests shall conform to the following requirements:

1. Test Requirement

Tests shall be required as defined elsewhere in the permit. Tests shall be performed at the maximum practical production rate.

2. Test Protocol

Required tests shall use standard EPA test methods. At least 60 days before the test, Permittee shall submit a test protocol to PCAQCD for review and approval; Permittee shall provide notice of the performance test at least 30 days prior to running the test.

3. Timing of Initial and Subsequent Tests

Tests shall be conducted within 60 days after achieving the maximum production at which the affected facility will be operated, but no later than 180 days after the initial startup of such facility.

4. Test Reports

A test report shall be submitted to the district for approval within forty-five (45) days after the test.

B. Sun Chips Line Testing³

Permittee shall conduct an initial stack test and opacity test on the exhausts of the Sun Chips Hammermill and the Sun Chips fryer to determine particulate matter (PM10) emissions.

Method 5 described in Appendix A of 40 CFR Part 60 shall be used determine particulate matter concentration. Method 9 described in Appendix A of 40 CFR Part 60 shall be used to determine opacity.

C. Biomass Boiler NSPS Testing [Federally Enforceable][40 CFR §§60.45c(a), 60.8, 60.48c.(b)](Code §6-1-030.5)

1. Initial Test

Within 60 days after achieving the maximum production at which the biomass boiler will be operated, but no later than 180 days after the initial startup of such boiler, Permittee shall conduct an initial performance test on the boiler stack for particulate matter, in accordance with 40CFR §60.8 and using the following methods described in Appendix A of Part 60:

- a. Method 1 to select the sampling sites and traverse points;
- b. Method 3A or 3B for gas analysis when applying Method 5, 5 B or 17;
- c. Method 5 or 17 to measure the PM concentration.
- d. The sampling time for each run shall be at least 120 minutes and the minimum sampling volume shall be 1.7 dscm.
- e. For Method 5 of Appendix A, the temperature of the sample gas in the probe and filter holder shall be monitored and maintained at $160 \pm 14^{\circ}\text{C}$ ($320 \pm 25^{\circ}\text{F}$).

³This performance test has not been conducted as of the date of this (draft) permit. Frito-Lay staff indicates this line started up on 3/2/2010.

- f. For determination of PM emissions, an oxygen (O₂) or carbon dioxide (CO₂) measurement shall be obtained simultaneously with each run of Method 5 or 17 by traversing the duct at the sample location.
- g. Method 9 shall be used for determining the opacity of the stack emissions.

2. Subsequent Tests

Permittee shall conduct subsequent annual tests by the anniversary date of the initial test.

D. Biomass Boiler Non-NSPS Testing [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §§3-1-160 & 3-1-170)

1. Within 60 days after achieving the maximum production at which the biomass boiler will be operated, but no later than 180 days after the initial startup of such boiler, Permittee shall conduct an initial stack test on the biomass boiler exhaust to determine the following:
 - a. CO and NO_x emission rates (expressed on lb/hr and lb/MMBtu) using EPA Reference Methods 10 and 20, respectively;
 - b. PM₁₀ and PM_{2.5} control efficiency of the multiclone/ESP system using the Methods used for the NSPS testing.
 - c. All metal HAPs detected using Reference Method 29;
 - d. Inorganic HAPs including hydrogen chloride and chlorine using Reference Method 26 or 26A;
 - e. Organic HAPs including acetaldehyde, acrolein, benzene, formaldehyde and toluene using Reference Method 18, 25 or 25A;
 - f. All other HAPs that will be detected by the EPA Reference Methods used in the three previous subsections.
2. The initial tests shall be performed at the maximum production rate and utilizing the wood waste/fuel combination determined to have the highest HHV while using the maximum amount of TDF allowed per day.
3. During the rotoclone/ESP system test, Permittee shall record the pressure drop and secondary voltage that the multiclone/ESP will be operated at. The pressure drop and voltage shall be submitted with the test report.
4. The test protocol required to be submitted shall indicate the fuel specification which will be utilized for the test and explain why it is representative of other fuel. The protocol for the HAPs testing shall list the Reference Methods to be used for the Control Officer's approval.
5. The test report shall identify whether the HAP test results show compliance with the HAP limitations §4 of the permit.
6. Subsequent testing
 - a. Tests for CO, NO_x and particulate matter control efficiency tests shall be repeated within 5 years of the initial one.
 - b. All HAP testing as required in subsections 1.c through f. above shall be repeated on an annual basis.

E. Feedstock Testing

1. Upon startup of the biomass boiler, Permittee shall begin a feedstock sampling program to determine whether the emissions estimates used for purposes of the permit application, specifically for lead and arsenic, are appropriate, and to ensure that no additional lead monitoring is required.
2. Permittee shall submit a protocol for approval to PCACQD indicating the EPA-approved

methods or ASTM methods to be used to determine lead and arsenic present in the boiler bottom ash.

3. Permittee shall collect monthly samples of the feedstock and test them in accordance with the following schedule:
 - a. Conduct quarterly testing of the aggregate of 3 monthly samples for 12 consecutive months. If at the end of 12 months, any of the testing results fall above 20% of the lead monitoring threshold⁴, Permittee shall continue the monthly collection/quarterly testing for another 12 months.
 - b. If during the first 12 months, all the testing results fall below 20% of the lead monitoring threshold, Permittee may continue the monthly sampling, but testing need only be conducted on an annual basis, using the aggregate samples from the past 12 months.
4. For each quarterly or annual test, Permittee shall prepare and submit a report to PCAQCD, within 45 days of the lab report being finalized. This report shall show the lead and arsenic content in the feedstock, as well as provide an estimate of emissions (tons per year) that the lead and arsenic content could potentially generate under the limitations of this permit.

F. General Opacity Testing

1. Opacity shall be determined using Reference Methods 9 and 203C, as applicable, in 40 CFR Part 60, Appendix A.
2. In addition to the opacity monitoring described in a previous section of this permit, within 6 months of the start-up of this facility, and every 6 months after that, Permittee shall conduct a full opacity test performed by a certified opacity observer on the following emission points:
 - a. Biomass Fuel Handling System: Each transfer point;
 - b. Flyash handling system
 - c. General Facility: all vents, exhausts and stacks.
3. To determine compliance, both Methods 9 and 203C shall be conducted on subsections a. and b. above.
4. Method 9 opacity tests shall consist of at least 1 hour of data, averaged in blocks of consecutive 6-minute periods. The average opacity for each 6-minute period shall be recorded at the end of each period.

⁴The current lead monitoring threshold is 1 tpy, and therefore 20% is 0.2 tpy. A 0.5 tpy threshold was proposed by EPA in December of 2009 but has not been promulgated yet.

8. Reporting and Notifications

A. Compliance Reporting (Code §3-1-083.A)

In order to demonstrate compliance with the provisions of this permit, the Permittee shall submit a semi-annual report containing a summary of the information required to be recorded pursuant to this permit, which summary shall clearly show that Permittee has complied with the operational and emissions limitations under this permit. All instances of deviations from permit requirements shall be clearly identified in such reports. For brevity, such deviation reports may incorporate by reference any written supplemental upset reports filed by Permittee during the reporting period. The report shall be submitted to the District within 30 days after the end of each calendar year. Appendix A is a form which may be used for this report.

B. Biomass Boiler NSPS Notification [*Federally Enforceable*] [40 CFR §§60.48c(a), 60.7](Code §6-1-030.5)

Permittee shall submit a notification to the District of the date of construction, reconstruction and actual startup as provided by 40 CFR §60.7. This notification shall include:

1. The design heat input capacity of the biomass boiler and identification of fuels to be combusted;
2. If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels;
3. The annual capacity factor at which the permittee anticipates operating the biomass boiler based on all fuels fired and based on each individual fuel fired.

C. Biomass Boiler NSPS Excess Emissions Reports [*Federally Enforceable*] [40 CFR §§60.48c(c), 60.7](Code §6-1-030.5)

On a semi-annual basis, Permittee shall submit excess emissions reports for any excess emissions from the biomass boiler that occur during each reporting period.

D. Annual Regular Compliance/Compliance Progress Certification (Code §3-1-083.A.4.)

Permittee shall annually submit a certification of compliance with the provisions of this permit to the Administrator of the EPA and to the District. The certification shall:

1. Be signed by a responsible official, namely the proprietor, a general partner, the president, secretary, treasurer or vice-president of the corporation, or such other person as may be approved by the Control Officer as an administrative amendment to this permit;
2. Identify each term or condition of the permit that is the basis of the certification;
3. Verify the compliance status with respect to each such term or condition;

- 4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;
- 5. Identify the permit provision, or other, compliance mechanism upon which the certification is based; and
- 6. Be postmarked within thirty (30) days of the start of each calendar year.

E. Deviations from Permit Requirements (Code §3-1-81.A.5.b.)

Permittee shall report any deviation from the requirements of this permit along with the probable cause for such deviation, and any corrective actions or preventative measures taken to the District within ten days of the deviation unless earlier notification is required by the provisions of this permit.

F. Semi-annual emissions inventory [Code §3-1-103. (Nov. '93)]

Since this source would be subject to an ADEQ permitting requirement, Permittee shall complete and submit to the District a semi-annual emissions inventory, disclosing actual emissions for the preceding calendar year. The submittal shall be made on a form provided by the District. The inventory is due by the latter of March 31, or ninety (90) days after the form is furnished by the District.

G. Notification of Construction & Start-up (Code § 3-1-083.)

For new facilities and modification of existing facilities, the Permittee shall notify the District in writing of:

- 1. The anticipated date of initial start-up of each facility of the source for which construction or modification is allowed by this permit; notice shall be sent not more than sixty (60) days nor less than five (5) days prior to such date;
- 2. The actual date of commencement of construction; notice shall be sent within fifteen (15) days of such date; and
- 3. The actual date of start-up; notice shall be sent within fifteen (15) days after such date.

9. Fee Payment

As an essential obligation under this permit, permit fee shall be assessed by the District and paid by Permittee in accord with the provisions of Code Chapter 3, Article 7, as they may exist at the time the fee is due. The permit fee shall be due annually on or before the anniversary date of the issuance of an individual permit, or formal grant of approval to operate under a general permit, or at such other time as may be designated now or hereafter by rule. The District will notify the Permittee of the amount to be due, as well as the specific date on which the fee is due.

10. General Conditions

A. Term (Code §3-1-089)

This permit shall have a term of five (5) years, measured from the date of issuance.

B. Basic Obligation (Code §3-1-081.)

Permittee shall operate in compliance with all conditions of this permit, the Pinal County Air Quality Control District ("the District") Code of Regulations ("Code"), and all State and Federal laws, statutes, and codes relating to air quality that apply to these facilities. Any permit noncompliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application and may additionally constitute a violation of the CAA.

C. Duty to Supplement Application (Code §§3-1-050.H., 3-1-081.A.8.e., 3-1-087.A.1.c., 3-1-110.)

Even after the issuance of this permit, a Permittee, who as an applicant who failed to include all relevant facts, or who submitted incorrect information in an application, shall, upon becoming aware of such failure or incorrect submittal, promptly submit a supplement to the application, correcting such failure or incorrect submittal. In addition, Permittee shall furnish to the District within thirty days any information that the Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit and/or the Code.

D. Right to Enter (Code §§ 3-1-132, 8-1-050)

Authorized representatives of the District shall, upon presentation of proper credentials and a showing that the District representative is equipped with certain safety equipment, namely a hard hat, be allowed:

1. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit;
2. To inspect any equipment, operation, or method required in this permit; and
3. To sample emissions from the source.

E. Transfer of Ownership

This permit may be transferred from one person to another by notifying the District at least 30 days in advance of the transfer. The notice shall contain all the information and items required by Code § 3-1-090. The transfer may take place if not denied by the District within 10 days of the receipt of the transfer notification.

F. Posting of Permit (Code §3-1-100)

Permittee shall firmly affix the permit, an approved facsimile of the permit, or other approved identification bearing the permit number, upon such building, structure, facility or installation for

which the permit was issued. In the event that such building, structure, facility or installation is so constructed or operated that the permit cannot be so placed, the permit shall be mounted so as to be clearly visible in an accessible place within a reasonable distance of the equipment or maintained readily available at all times on the operating premises.

G. Permit Revocation for Cause (Code §3-1-140)

The Director of the District ("Director") may revoke this permit for cause, which cause shall include occurrence of any of the following:

1. The Director has reasonable cause to believe that the permit was obtained by fraud or material misrepresentation;
2. Permittee failed to disclose a material fact required by the permit application form or a regulation applicable to the permit;
3. The terms and conditions of the permit have been or are being violated.

H. Certification of Truth, Accuracy, and Completeness (Code § 3-1-175.)

Any application form, report, or compliance certification submitted pursuant to the Code shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 3 of the Code shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

I. Permit Expiration and Renewal

Expiration of this permit will terminate the facility's right to operate unless a timely application for renewal has been submitted in accordance with §§3-1-050, 3-1-055 and 3-1-060 or a substitute application for a general permit under §3-5-490. For Class I permit renewals, a timely application is one that is submitted at least 6 months, but not greater than 18 months prior to the date of permit expiration. For Class II or Class III permit renewals, a timely application is one that is submitted at least 3 months, but not greater than 12 months prior to the date of permit expiration.

J. Severability (Code §3-1-081.A.7)

The provisions of this permit are severable, and if any provision of this permit is held invalid the remainder of this permit shall not be affected thereby.

K. Permit Shield (Code § 3-1-102.)

1. Compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit.
2. 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 this permit.

L. Permit Revisions (Code Chapter 3, Article 2)

1. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Other than as expressly provided in Code Chapter 3, Article 2, the filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
2. The permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
3. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.
4. Should this source become subject to a standard promulgated by the Administrator pursuant to CAA §112(d), then Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard. (Code §3-1-050.C.5)

M. Permit Re-opening (Code §3-1-087.)

1. This permit shall be reopened if either:
 - a. The Control Officer determines that it contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of it; or
 - b. The Control Officer determines that it needs to be revised or revoked to assure compliance with the applicable requirements.
2. If this permit must be reopened or revised, the District will notify the permittee in accord with Code §3-1-087.A.3.

N. Record Retention (Code §3-1-083.A.2.b)

Permittee shall retain for a period of five (5) years all documents required under this permit, including reports, monitoring data, support information, calibration and maintenance records, and all original recordings or physical records of required continuous monitoring instrumentation.

O. Scope of License Conferred (Code §3-1-081.)

This permit does not convey any property rights of any sort, or any exclusive privilege.

P. Emergency Provision (Code §8-1-030)

1. In the event of a failure of air pollution control equipment, or malfunction, or abnormal operation of any equipment, any of which results in a violation of an applicable emission limitation set forth in this permit, including either an increase of emissions above a rate-limitation or violation of an operating limitation, then the Permittee, shall comply with the provisions of Code § 8-1-030 and ARS §49-476.01, including notifying the District of such event within 24 hours or by the next business day, whichever is later. Permittee shall notify the District at phone number (520) 868-6760, and shall provide a written report within three (3) working days of the beginning of such occurrence. The obligation under this section shall arise when an occurrence results in an increase of emissions above:
 - a. Enforceable rate limitations established for those pollutants addressed in this Permit; or
 - b. For any other pollutant, any applicable limitation arising under the Code.
2. A malfunction (as defined by Code §1-3-140.80) is any sudden and unavoidable failure of air pollution control equipment or process equipment or a process to operate in a normal and usual manner. Failures that are caused by poor maintenance, or could have been prevented by the exercise of reasonable care shall not be considered a malfunction.
3. An "emergency" shall be defined according to the inclusions and exclusions set forth in Code §3-1-081.E.1. and the emergency response provisions in Code §3-1-081.E. are applicable to this permit.

11. Facility Specific Data

A. Equipment List

Equipment for which emissions are allowed by this permit are as follows:

ID	EQUIPMENT	CAPACITY	MAKE	MODEL
4A/4B	Corn Transfer System		Ferrel-Ross	
5A/5B	Corn Cleaner System		Ferrel-Ross	
9C	Potato Chip Fryer (steam)		Heat & Control, Inc	
11C	Venturi Scrubber for Potato Chip Fryer Exhaust		Neptune Air-Pol	
15A	Corn Chip Fryer (steam)		Heat & Control, Inc	
15B	Ambient Air Cooler	8970 acfm	Heat & Control, Inc	593
16B	2 - Tortilla Chip Ovens	5.383 MMBtu/hr each	Casa Herrera	

17B	Tortilla Chip Fryer (steam)			
18	Ambient Air Cooler	8970 acfm	Heat & Control, Inc	593
19	Corn Meal Transfer System			
20	4- Fried Cheese Puff (FCP) Extruders			
21	FCP Fryer			
22	Ambient Cooler			
23	Slurry Skid Fume Scrubber			
Sun Chips Line	Whole Wheat and Corn Handling System			
	Hammermill			
	Fryer			
	Cooking Kettle			
	On-Machine Seasoner, vents to a dust collector			
F1	Propane Flare	1.5 MMBtu/hr		
SD	Starch Dryer	0.415 MMBtu/hr	Holt Sheet Metal	
PB	Boiler	79.2 MMBtu/hr	Babcock & Wilcox	FM10-79
	Fuel Handling System Concrete Bunker			
	Fuel Handling System 30' Incline Belt Conveyor with magnets.			
	Fuel Handling System Metering Hopper			
Biomass Boiler	Biomass Boiler	78.3 MMBtu/hr - 60,000 lb/hr steam	Alpha Boilers, Inc.	
	Multi-clone			
	Electrostatic Precipitator	31,528 acfm	PPC Industries	XH-121212-3S
	Selective Catalytic Reduction (SCR) with ammonia injection.			
	Flyash Conveyor System			
	Flyash Storage Bin			

B. Insignificant Activities

1. 20,000 Gallon Diesel Fuel Storage Tank
2. Diesel Water Pump
3. Inkjet Printers with ribbons that do not use VOC-containing solvents
4. 175 hp emergency generator.

Appendix B

Semi-annual Report

Permit V20638.000

Abstract

This constitutes a semi-annual report, documenting emissions and use of emission-generating materials during the subject reporting period.

Facility - Frito-Lay, Inc.
1450 W. Maricopa Hwy., Casa Grande, AZ

Reporting Period - January - June - _____ July to December - _____ Year - _____

Emissions report

Emissions of PM10/PM2.5 (facility-wide) - _____ tons

Emissions of HAPs from Biomass Boiler - _____ tons

Operations Report

Total amount of chips/snacks produced in (5) production lines - _____ tons

Was each fuel shipment visually inspected prior to receipt? (Please attach records of any accepted non-approved items found in shipments with an explanation of how it was handled) YES/NO

Have opacity screenings required by §6.C been conducted? YES____ NO ____

Fuel Report

Natural Gas Purchased - _____ therms.

Aggregate Operational Hours of the Propane Driven Equipment -

Equipment	Hours
Boiler	
Flare	
Tortilla Chip Ovens	
Starch Dryer	

Please attach a log of daily TDF use as determined by shipment inventories.

Maximum Heat Input of biomass boiler (HHV-dry) - MMbtu

Total biomass fuel burned - tons

Total sawdust/sanderdust burned - tons

COMS Report

Were any performance evaluations conducted on the COMS during the reporting period? YES___ NO___
(Please submit reports for any such evaluations)

Electrostatic Precipitator Report

Was the secondary voltage across the ESP measured on a continuous basis? YES___ NO___

Did any excursions occur during reporting period? YES___ NO___

Testing Requirement

Was the Sun Chips Line testing performed as required under Section §7.B of this permit? YES___ NO___

If applicable, were the Biomass Boiler tests required by Section §7.C conducted? YES___ NO___

If applicable, were the Biomass Boiler tests required by Section §7.D conducted? YES___ NO___

If applicable, was the Heating Value Test required by Section §7.E conducted? YES___ NO___

Were the opacity tests required by §7.F conducted? YES___ NO___

Deviations Report

Have there been any deviations from permit requirements during this reporting period? YES___ NO___

If yes, please submit all the reports associated with the deviations.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, that the statements and information in this report are true, accurate and complete.

Signed _____

Printed Name _____

Title _____

Date _____

Mail to - Pinal County Air Quality Control District
PO Box 987
Florence, AZ 85232