



JUL 18 2012

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

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # N-767**  
**Project # N-1113699**

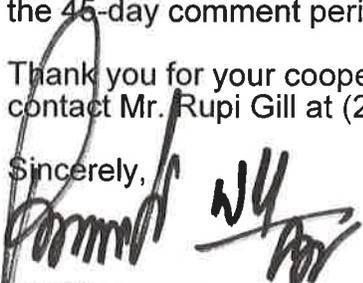
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. J R Simplot Company is proposing a Title V minor permit modification to incorporate the recently issued N-767-84-0 into the Title V operating permit. Install a transportable 480 hp Caterpillar Model C9 (Tier 3 Certified) diesel-fired IC engine powering an electric generator

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-767-84-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner  
Director of Permit Services

Enclosures

**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

# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: N-1113699

Engineer: Kai Chan  
Date: July 12, 2012

Facility Number: N-767  
Facility Name: J R Simplot Company  
Mailing Address: P.O. Box 198  
Lathrop, CA 95330-0198

Contact Name: Ryan Mock  
Phone: (209) 858-6429

Responsible Official: John Yanak  
Title: California Manufacturing Manager

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## **I. PROPOSAL**

J R Simplot Company is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) permit N-767-84-0 into their Title V operating permit. The facility is installing a new transportable 480 hp Caterpillar Model C9 (Tier 3 Certified) diesel-fired IC engine powering an electric generator.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## **II. FACILITY LOCATION**

16777 S. Howland Road  
Lathrop, CA

### III. EQUIPMENT DESCRIPTION

**N-767-84-1:** TRANSPORTABLE 480 HP CATERPILLAR MODEL C9 (TIER 3 CERTIFIED) DIESEL-FIRED IC ENGINE POWERING AN ELECTRIC GENERATOR.

### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

J R. Simplot Company is proposing to incorporate Authority to Construct (ATC) permit N-767-84-0 into the Title V Permit to Operate (PTO) as N-767-84-1. This ATC permit was issued to install a new 480 hp Caterpillar Model C9 (Tier 3 Certified) diesel-fired IC engine powering an electric generator. This one-time use transportable electric generator will be used to provide electrical power to the maintenance and engineering building to support maintenance activities during a ten day period when the facility's electric transformer is replaced. During this period the facility's fertilizer pellet plant under permit unit N-767-6 will be shut down for maintenance work. A copy of the ATC permit N-767-84-0 is included in Appendix B.

#### Proposed Permit to Operate N-767-84-1:

1. Permit conditions 1. and 3. on the ATC permit were deleted since they already appear on the facility-wide permit N-767-0-3.
2. Permit conditions 2., 4., 5., 6., 7., 8., 9., 10., 11., 13., 14., 15., 16., and 17. from the ATC permit appears as conditions 1., 2., 3., 4., 5., 6., 7., 8., 9., 11., 12., 13., 14., and 15. on the proposed PTO, respectively.
3. Permit condition 12. from the ATC permit appears as condition 10. on the proposed PTO. This condition was modified to specifically indicate the date this one-time use permit will expire.

4. Permit condition 18. on the ATC permit was deleted since this condition was satisfied by the applicant's submittal of the application for this Title V permitting action.

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and

3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

Compliance is expected with this rule.

## **VIII. APPENDICES**

- Appendix A:** Proposed Draft Title V Operating Permit N-767-84-1
- Appendix B:** Authority to Construct Permit N-767-84-0
- Appendix C:** Emissions Increases
- Appendix D:** Permit Application

# **APPENDIX A**

Proposed Modified Title V Operating Permit No.  
N-767-84-1

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-767-84-1

EXPIRATION DATE: 11/30/2014

## EQUIPMENT DESCRIPTION:

TRANSPORTABLE 480 HP CATERPILLAR MODEL C9 (TIER 3 CERTIFIED) DIESEL-FIRED IC ENGINE POWERING AN ELECTRIC GENERATOR.

## PERMIT UNIT REQUIREMENTS

1. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. The engine shall not operate unless the fertilizer pellet plant under permit N-767-6 is shutdown. [District Rule 2201]
3. This engine shall not be operated at one location or site at the facility for more than 12 consecutive months. [District Rules 2201 & 4701, and 17 CCR 93116, 40 CFR Part 60 Subpart IIII, & 40 CFR Part 63 Subpart ZZZZ]
4. The engine shall not operate within 1,000 feet of any offsite receptor. [District Rule 4201]
5. {3405} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
6. During periods of operation, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables, and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
7. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [17 CCR 93116]
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93116]
9. The engine shall not operate more than 240 hours in any one calendar year. [District Rules 2201 & 4201]
10. The engine shall cease operation and be removed from the facility by September 30, 2012. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
11. Emissions from this IC engine shall not exceed any of the following limits: 3.5 g-NOx/bhp-hr, 1.3 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93116]
12. Emissions from this IC engine shall not exceed 0.15 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93116]
13. The permittee shall maintain daily records of the following: (a). The total quantity of hours the engine was operated (in hours/day); (b). The type of fuel used in the engine; (c). Engine maintenance or modifications performed; (d). Engine operational characteristics monitoring; (e). Any other information necessary to demonstrate compliance with Rule 4702. [District Rules 1070 and 4702]
14. The permittee shall maintain a record of the date the engine was initially operated onsite and the cumulative annual hours the engine is operated (in hours/year). The cumulative total shall be updated at least monthly. [District Rules 1070 and 2201]
15. 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 and 4702]

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

# **APPENDIX B**

Authority to Construct Permit No.  
N-767-84-0



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-767-84-0

**ISSUANCE DATE:** 09/30/2011

**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:**

TRANSPORTABLE 480 HP CATERPILLAR MODEL C9 (TIER 3 CERTIFIED) DIESEL-FIRED IC ENGINE POWERING AN ELECTRIC GENERATOR.

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. The engine shall not operate unless the fertilizer pellet plant under permit N-767-6 is shutdown. [District Rule 2201]
5. This engine shall not be operated at one location or site at the facility for more than 12 consecutive months. [District Rules 2201 & 4701, and 17 CCR 93116, 40 CFR Part 60 Subpart IIII, & 40 CFR Part 63 Subpart ZZZZ]
6. The engine shall not operate within 1,000 feet of any offsite receptor. [District Rule 4201]
7. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
8. During periods of operation, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables, and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
9. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [17 CCR 93116]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services

N-767-84-U, Sep 30 2011 2:43PM -- CHANK . Joint Inspection NOT Required

10. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93116]
11. The engine shall not operate more than 240 hours in any one calendar year. [District Rules 2201 & 4201]
12. The engine shall cease operation and be removed from the facility within one year from the date of initial operation at the facility. [District Rules 2201 and 4201]
13. Emissions from this IC engine shall not exceed any of the following limits: 3.5 g-NO<sub>x</sub>/bhp-hr, 1.3 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93116]
14. Emissions from this IC engine shall not exceed 0.15 g-PM<sub>10</sub>/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93116]
15. The permittee shall maintain daily records of the following: (a). The total quantity of hours the engine was operated (in hours/day); (b). The type of fuel used in the engine; (c). Engine maintenance or modifications performed; (d). Engine operational characteristics monitoring; (e). Any other information necessary to demonstrate compliance with Rule 4702. [District Rules 1070 and 4702]
16. The permittee shall maintain a record of the date the engine was initially operated onsite and the cumulative annual hours the engine is operated (in hours/year). The cumulative total shall be updated at least monthly. [District Rules 1070 and 2201]
17. 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 and 4702]
18. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520]

# **APPENDIX C**

## **Emissions Increases**

Permit Number	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-767-84-1	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

# **APPENDIX D**

## Application

# San Joaquin Valley Air Pollution Control District

*www.valleyair.org*

## Permit Application For:

ADMINISTRATIVE  
AMENDMENT

MINOR  
MODIFICATION

SIGNIFICANT  
MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">J. R. Simplot Company</p>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>P.O. Box 198</u>  CITY: <u>Lathrop</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95330-0198</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>16777 Howland Rd.</u> CITY: <u>Lathrop</u>  <u>      </u> ¼ SECTION <u>35</u> TOWNSHIP <u>1S</u> RANGE <u>6E</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <b>Manufacture, Package, &amp; Distribute Fertilizer and Agricultural Chemicals.</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  JR Simplot Co requests to incorporate the requirements of ATC N-767-84-0 in to Title V Permit.	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">Ryan Mock</p>	TITLE OF APPLICANT: EHS&S Manager
7. SIGNATURE OF APPLICANT:  	DATE: <u>10-21-11</u>  PHONE: ( 209) 858-6429 FAX: ( 209) 858-6404 Email: ryan.mock@Simplot.com.com

<i>For APCD Use Only:</i> <u>Simplot</u> <span style="float: right;"><u>N. 767</u></span>	
<p><b>REC'D</b> DATE STAMP <b>OCT 24 2011</b> SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED: \$ <u>71.00</u> CHECK#: <u>01169709</u> DATE PAID: <u>10/21/11</u> PROJECT NO: <u>N1113699</u> FACILITY ID: <u>N-767</u></p>

# San Joaquin Valley Unified Air Pollution Control District

## TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

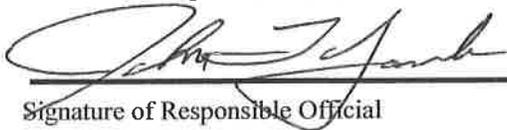
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: J. R. Simplot Company	FACILITY ID: N- 767
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: J. R. Simplot	
3. Agent to the Ryan Mock	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

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

  
 \_\_\_\_\_  
 Signature of Responsible Official

10-20-2011  
 \_\_\_\_\_  
 Date

John Yanak  
 \_\_\_\_\_  
 Name of Responsible Official (please print)  
  
 California Manufacturing Manager  
 \_\_\_\_\_  
 Title of Responsible Official (please print)