



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV 24 2010

Roger Hoffdahl  
Corn Products International, Inc  
P. O. Box 6129  
Stockton, CA 95206

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-238  
Project # N-1103560**

Dear Mr. Hoffdahl:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct N-238-19-5 into the Title V operating permit. This project is to replace the existing 12,000 gallon above ground salt slurry storage tank with same capacity new tank. The existing tank has been aged to a point where it needs replacement.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-238-19-5, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

DW:JH/dg

Enclosures

**Seyed Sadredin**

Executive Director/Air Pollution Control Officer

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**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  
[www.valleyair.org](http://www.valleyair.org)

**Southern Region**

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



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV 24 2010

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-238**  
**Project # N-1103560**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Corn Products International, Inc is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-238-19-5 into the Title V operating permit. This project is to replace the existing 12,000 gallon above ground salt slurry storage tank with same capacity new tank. The existing tank has been aged to a point where it needs replacement.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-238-19-5, 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

DW:JK/dg

Enclosures

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## **Title V APPLICATION REVIEW Minor Modification**

**Facility Number:** N-238 **Date:** October 21, 2010  
**Facility Name:** Corn Products International Inc  
**Mailing Address:** P.O. Box 6129  
Stockton, CA 95206

**Contact Name:** Roger Hoffdahl  
**Phone:** (209) 982-1920 ext. 233  
**Fax:** (209) 982-5012

**Responsible Official:** Eric Chutorash  
**Title:** Stockton Plant Manager

**Processing Staff:** Jagmeet Kahlon  
**Project Number:** N1103560

### **I. PROPOSAL**

Corn Products International Inc has proposed to incorporate Authority to Construct (ATC) N-238-19-5 into the Title V operating permit. This ATC was issued without Certificate of Conformity (COC). The ATC authorized the facility to replace the existing 12,000 gallon above ground salt slurry storage tank with same capacity new tank. The existing tank has been aged to a point where it needs replacement. The applicant has not proposed any changes to the existing emission factor, salt receiving rate, or any other parameter listed in the existing Permit to Operate (PTO) N-238-19-4, which is included in Appendix V of this document.

The purpose of this document 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 revising permit conditions that were established under Permit PTO N-238-19-4.

### **II. FACILITY LOCATION**

This facility is located at 1021 Industrial Drive, Stockton, California.

### **III. EQUIPMENT DESCRIPTION**

ONE 12,000 GALLON ABOVE GROUND SALT SLURRY STORAGE TANK

### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

The proposed project is a Minor Modification to the Title V permit. Therefore, public review is not required.

## V. APPLICABLE REQUIREMENTS

Rule 2520 Federally Mandated Operating Permits (6/21/01)

## VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Corn Products International Inc is proposing to incorporate Authority to Construct (ATC) N-238-19-5 into the Title V Permit to Operate as PTO N-238-19-6. This permit is for the salt slurry storage tank. A copy of the ATC is included in Appendix II of this document. The following changes were made to permit conditions on PTO N-238-19--4:

Condition #1 (listed below) on PTO N-238-19-6 requires that "visible emissions from the vent of the salt storage tank shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour." The condition has been revised during the ATC permitting action. The condition now states that "visible emissions from the sock filter serving the vent of the salt storage tank shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour". The reason for this change is that the proposed new tank's vent will be ducted to a static sock filter. Therefore, this change was necessary.

Due to this sock filter, the following new conditions are added into the permit during the ATC permitting action:

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]"
- A spare sock filter shall be kept on the premises. [District Rule 2201]
- The sock filter shall be thoroughly inspected annually for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2]
- The permittee shall maintain records of the sock filter maintenance, inspections and repair. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2]

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

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 (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); 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 (Appendix III).

Compliance is expected with this Rule.

### **APPENDICES**

Appendix I: Proposed Title V Operating Permit No. N-238-19-6  
Appendix II: Authority to Construct N-238-19-5  
Appendix III: Permit Application  
Appendix IV: Emissions Change  
Appendix V: Title V Permit to Operate N-238-19-4

Appendix I  
Proposed Title V Operating Permit No. N-238-19-6

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-19-6

**EXPIRATION DATE:** 03/31/2014

**EQUIPMENT DESCRIPTION:**

ONE 12,000 GALLON ABOVE GROUND SALT SLURRY STORAGE TANK

DRAFT

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the sock filter serving the vent of the salt storage tank shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. A spare sock filter shall be kept on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The quantity of salt received shall not exceed 60,000 pounds during any one day and shall not exceed 120,000 pounds during any one month. [District Rule 2201] Federally Enforceable Through Title V Permit
5. PM10 emission rate shall not exceed 0.003 pounds per ton of salt received. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A minimum of 7.7 gpm of water shall be added during transfer of the salt from the trucks to the storage tank. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The sock filter shall be thoroughly inspected annually for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The permittee shall maintain a daily record of the date and quantity of salt received. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall maintain records of the sock filter maintenance, inspections and repair. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

DRAFT

**Appendix II**  
**Authority to Construct N-238-19-5**



COPY

## AUTHORITY TO CONSTRUCT

PERMIT NO: N-238-19-5

ISSUANCE DATE: 09/30/2010

LEGAL OWNER OR OPERATOR: CORN PRODUCTS INTERNATIONAL

MAILING ADDRESS: P O BOX 6129  
STOCKTON, CA 95206-0129

LOCATION: 1021 INDUSTRIAL DR  
STOCKTON, CA 95206

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ONE (1) 12,000 GALLON ABOVE GROUND SALT SLURRY STORAGE TANK: REPLACE THE EXISTING TANK WITH SAME CAPACITY TANK. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BECOME: ONE 12,000 GALLON ABOVE GROUND SALT SLURRY STORAGE TANK

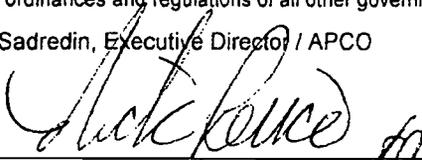
### CONDITIONS

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. Visible emissions from the sock filter serving the vent of the salt storage tank shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
5. A spare sock filter shall be kept on the premises. [District Rule 2201]
6. The quantity of salt received shall not exceed 60,000 pounds during any one day and shall not exceed 120,000 pounds during any one month. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emission rate shall not exceed 0.003 pounds per ton of salt received. [District Rule 2201] Federally Enforceable Through Title V Permit
8. A minimum of 7.7 gpm of water shall be added during transfer of the salt from the trucks to the storage tank. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The sock filter shall be thoroughly inspected annually for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2]

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-238-19-5 : Sep 30 2010 4:33PM - KAHLONU : Joint Inspection NOT Required

10. The permittee shall maintain a daily record of the date and quantity of salt received. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of the sock filter maintenance, inspections and repair. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2]
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

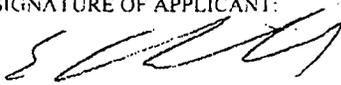
Appendix III  
Permit Application

# 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: <b>CORN PRODUCTS INTERNATIONAL INC.</b>		
2. MAILING ADDRESS:  STREET/P.O. BOX: <b>PO BOX 6129</b>		
CITY: <b>Stockton</b>	STATE: <b>CA</b>	9-DIGIT ZIP CODE: <b>95206</b>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <b>1021 Industrial Drive</b> CITY: <b>Stockton</b>		INSTALLATION DATE: <b>ASAP, when ATC received</b>
NE      SECTION <b>24</b> TOWNSHIP <b>1N</b> RANGE <b>6E</b>		
4. GENERAL NATURE OF BUSINESS: <b>CORN WET MILLING</b>		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  <b>ATC Permit request, District Project #N-1103308 to replace with like 12,000 gallon Salt Slurry Storage Tank, Permit N238-19-3.</b>		
6. TYPE OR PRINT NAME OF APPLICANT: Eric Chutorash		TITLE OF APPLICANT: Stockton Plant Manager
7. SIGNATURE OF APPLICANT: 		DATE: <b>9/21/2010</b>
		PHONE: <b>(209) 938-7141</b>
		FAX: <b>(209) 982-5012</b>
		EMAIL: <b>eric.chutorash@cornproducts.com</b>

*For APCD Use Only:*

<p><b>RECEIVED</b></p> <p>DATE STAMP: <b>SEP 22 2010</b></p> <p style="text-align: center;">SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED: \$ <b>0</b>      CHECK#: <b>NA</b></p> <p>DATE PAID: <b>PM 9/21/10</b></p> <p>PROJECT NO: <b>N-1103560</b>      FACILITY ID: <b>N238</b></p>
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**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 (Replace Salt Tank)                      AMENDMENT

COMPANY NAME: CORN PRODUCTS INTERNATIONAL INC.	FACILITY ID: N-238
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: CORN PRODUCTS INTERNATIONAL INC.	
3. Agent to the Owner: Eric Chutorash	

**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

10/21/10  
\_\_\_\_\_

Date

**ERIC CHUTORASH**

\_\_\_\_\_  
Name of Responsible Official (please print)

**STOCKTON PLANT MANAGER**

\_\_\_\_\_  
Title of Responsible Official (please print)

**Appendix IV  
Emissions Change**

## Emissions Change

There is no increase in facility emissions as a result of this project.

Appendix V  
Title V Permit to Operate N-238-19-4

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-19-4

**EXPIRATION DATE:** 03/31/2014

**EQUIPMENT DESCRIPTION:**

ONE (1) 12,000 GALLON ABOVE GROUND SALT SLURRY STORAGE TANK

## **PERMIT UNIT REQUIREMENTS**

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1. Visible emissions from the vent of the salt storage tank shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The quantity of salt received shall not exceed 60,000 pounds during any one day and shall not exceed 120,000 pounds during any one month. [District NSR Rule] Federally Enforceable Through Title V Permit
3. PM10 emission rate shall not exceed 0.003 pounds per ton of salt received. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A minimum of 7.7 gpm of water shall be added during transfer of the salt from the trucks to the storage tank. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Permittee shall maintain a daily record of the date and quantity of salt received. [District NSR Rule] Federally Enforceable Through Title V Permit
6. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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