



SEP 17 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-1101812**

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-238-38-0 into the Title V operating permit. The proposed project includes installation of a 28.8 MMBtu/hr rental boiler. This boiler is brought to site when the primary steam supply sources are shutdown for periodic maintenances and or repairs. The primary steam supply source includes facility's own turbine and heat recovery boiler (N-238-18) and a coal fired boiler, CFB, (N-802-1) located at the adjacent Air Products Manufacturing Corporation's cogeneration facility.

Enclosed is the engineering evaluation with the following attachments: proposed Title V permit, recently issued Authority to Construct N-238-38-0, emission increases, and application. 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

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



SEP 17 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-1101812

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-238-38-0 into the Title V operating permit. The proposed project includes installation of a 28.8 MMBtu/hr rental boiler. This boiler is brought to site when the primary steam supply sources are shutdown for periodic maintenances and or repairs. The primary steam supply source includes facility's own turbine and heat recovery boiler (N-238-18) and a coal fired boiler, CFB, (N-802-1) located at the adjacent Air Products Manufacturing Corporation's cogeneration facility.

Enclosed is the engineering evaluation with the following attachments: proposed Title V permit, recently issued Authority to Construct N-238-38-0, emission increases, and application. 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.

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

Title V APPLICATION REVIEW Minor Modification

Facility Number: N-238 **Date:** August 5, 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: Mike Iles
Title: Stockton Plant Manager

Processing Staff: Jagmeet Kahlon
Project Number: N1101812

I. PROPOSAL

Corn Products International Inc has proposed to incorporate Authority to Construct (ATC) N-238-38-0 into the Title V operating permit. This ATC was issued without Certificate of Conformity (COC). The ATC is authorizing them to bring-in a rental boiler anytime in a given year when their primary steam supply sources are shutdown for scheduled periodic maintenances and or repairs. These primary steam supply sources include CPI's own turbine and heat recovery boiler (N-238-18) and a coal fired boiler, CFB, (N-802-1) located at the adjacent Air Products Manufacturing Corporation's (APMC) cogeneration facility.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements.

II. FACILITY LOCATION

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

III. EQUIPMENT DESCRIPTION

28.8 MMBTU/HR NATURAL GAS-FIRED BOILER EQUIPPED WITH AN ALZETA MODEL 22-2SO-30/30 ULTRA LOW NOX BURNER SYSTEM OR DISTRICT APPROVED EQUIVALENT (TEMPORARY REPLACEMENT EMISSION UNIT FOR N-238-18 AND/OR N-802-1)

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

District 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-238-38-0 into the Title V Permit to Operate as PTO N-238-38-1. This permit is for the rental boiler. A copy of the ATC is included in Appendix II of this document.

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-238-38-1

Appendix II: Authority to Construct N-238-38-0

Appendix III: Permit Application

Appendix IV: Emissions Change

Appendix I
Proposed Title V Operating Permit No. N-238-38-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-238-38-1

EXPIRATION DATE: 03/31/2009

EQUIPMENT DESCRIPTION:

28.8 MMBTU/HR NATURAL GAS-FIRED BOILER EQUIPPED WITH AN ALZETA MODEL 22-2SQ-30/30 ULTRA LOW NOX BURNER SYSTEM OR DISTRICT APPROVED EQUIVALENT (TEMPORARY REPLACEMENT EMISSION UNIT FOR N-238-18 AND/OR N-802-1

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
4. This boiler shall be removed from the site before 180 cumulative days on site in any twelve month period and prior to July 1, 2010. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The boiler shall only operate under one or more of the following circumstances: while permit unit N-802-1 is not operating; up to 40 hours while permit unit N-802-1 is fired exclusively on natural gas during a start up; or while permit unit N-238-18 is not operating. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The boiler shall only be fired on PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from the boiler shall not exceed any of the following limits: 9.0 ppmvd NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.004 lb-VOC/MMBtu. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
8. The heat input to the boiler shall not exceed 550 MMBtu/day when this unit is replacing permit unit N-238-18. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The heat input to the boiler shall be less than 30,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.48(c)(g)] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ within 7 days of startup of the unit and at least once every month thereafter (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 2201, 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
15. Records of daily operations including dates and hours operated, the amount of fuel consumed, and cumulative heat input to the boiler on a daily and an annual basis shall be maintained on the premises at all times. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
16. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305 and 4306] Federally Enforceable Through Title V Permit
17. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010] Federally Enforceable Through Title V Permit
19. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
20. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit

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

DRAFT

Appendix II
Authority to Construct N-238-38-0



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: N-238-38-0

ISSUANCE DATE: 09/14/2009

LEGAL OWNER OR OPERATOR: CORN PRODUCTS INTERNATIONAL
MAILING ADDRESS: PO BOX 6129
STOCKTON, CA 95206-0129

LOCATION: 1021 INDUSTRIAL DR
STOCKTON, CA 95206

EQUIPMENT DESCRIPTION:

28.8 MMBTU/HR NATURAL GAS-FIRED BOILER EQUIPPED WITH AN ALZETA MODEL 22-2SO-30/30 ULTRA LOW NOX BURNER SYSTEM OR DISTRICT APPROVED EQUIVALENT (TEMPORARY REPLACEMENT EMISSION UNIT FOR N-238-18 AND/OR N-802-1)

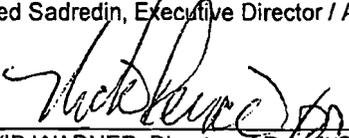
CONDITIONS

1. 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]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. 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]
6. This boiler shall be removed from the site before 180 cumulative days on site in any twelve month period and prior to July 1, 2010. [District Rule 2201]
7. The boiler shall only operate under one or more of the following circumstances: while permit unit N-802-1 is not operating; up to 40 hours while permit unit N-802-1 is fired exclusively on natural gas during a start up; or while permit unit N-238-18 is not operating. [District Rule 2201]
8. The boiler shall only be fired on PUC regulated natural gas. [District Rule 2201]

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.

eyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

N-238-38-0: Sep 14 2009 4:24PM - HARADERJ : Joint Inspection NOT Required

9. Emissions from the boiler shall not exceed any of the following limits: 9.0 ppmvd NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.004 lb-VOC/MMBtu. [District Rules 2201, 4305 and 4306]
 10. The heat input to the boiler shall not exceed 550 MMBtu/day when this unit is replacing permit unit N-238-18. [District Rule 2201]
 11. The heat input to the boiler shall be less than 30,000 MMBtu/year. [District Rule 2201]
 12. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.48(c)(g)]
 13. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ within 7 days of startup of the unit and at least once every month thereafter (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 2201, 4305 and 4306]
 14. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306]
 15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306]
 16. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306]
 17. Records of daily operations including dates and hours operated, the amount of fuel consumed, and cumulative heat input to the boiler on a daily and an annual basis shall be maintained on the premises at all times. [District Rule 2201 and 40 CFR 60.48 (c)(g)]
 18. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305 and 4306]
 19. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201]
 20. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010]
- Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

22. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201]

Appendix III
Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: CORN PRODUCTS INTERNATIONAL INC.	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>PO BOX 6129</u> CITY: <u>Stockton</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95206</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>1021 Industrial Drive</u> CITY: _____ <u>NE</u> ¼ SECTION <u>24</u> TOWNSHIP <u>1N</u> RANGE <u>6E</u>	INSTALLATION DATE: ATC Issue Date 09/14/2009 Portable, as needed in 2010.
4. GENERAL NATURE OF BUSINESS: CORN WET MILLING	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Add SJVAPC District ATC N238-38-0, TREU trailer mounted, 28.8 mmbtu/hr Portable Boiler to be delivered to site as needed in 2010. Note: Permit condition #6, boiler must be removed from this site prior to July 1, 2010. Corn Products will cancel this permit and apply for a new ATC at that time.	
6. TYPE OR PRINT NAME OF APPLICANT: Roger Hoffdahl	TITLE OF APPLICANT: Mgr Regulatory Affairs
7. SIGNATURE OF APPLICANT: 	DATE: 1/14/2010 PHONE: (209) 982-1920 ext.233 FAX: (209) 982-5012 EMAIL: roger.hoffdahl@cornproducts.com

For APCD Use Only:

<p>DATE STAMP RECEIVED MAY 04 2010 SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED: <u>\$19.00</u> CHECK#: <u>632</u> DATE PAID: <u>5-4-10 OTC</u> PROJECT NO: <u>N1101812</u> FACILITY ID: <u>N 238</u></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 AMENDMENT
 MINOR PERMIT MODIFICATION

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:	

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:

Mike Iles
 Signature of Responsible Official *C. Ross Walker*

4-7-2010
 Date

Mike Iles

 Name of Responsible Official (please print)

Stockton Plant Manager

 Title of Responsible Official (please print)

Appendix IV
Emissions Change

Emissions Change

The proposed boiler will be replacing another unit such that this replacement unit will not emit more than the unit it is replacing. Thus, there will be no increase in facility emissions as a result of this project.