San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

JAN 27 2011

Scott Kinghorn
Frito-Lay North America Inc
22801 Highway 58
Bakersfield, CA 93314

Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-2026
Project # S-1104814

Dear Mr. Kinghorn:

Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The applicant proposes to replace the Carter-Day screen with an Apex separator, replace Pulse-Jet fabric filter with a MAC Industries fabric collector and increase the throughput from 6 tons/hr to 9 tons/hr (equivalent to 216 tons/day).

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Thom Maslowski, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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AIR POLLUTION CONTROL DISTRICT

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JAN 27 2011

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

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**
District Facility # S-2026
Project # S-1104814

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Frito-Lay North America Inc, located at 22801 Highway 58 in Bakersfield, CA, which has been issued a Title V permit. Frito-Lay North America Inc is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The applicant proposes to replace the Carter-Day screen with an Apex separator, replace Pulse-Jet fabric filter with a MAC Industries fabric collector and increase the throughput from 6 tons/hr to 9 tons/hr (equivalent to 216 tons/day).

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # S-2026-6-8 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

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San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review

Facility Name:	Frito-Lay North America Inc	Date:	January 13, 2010
Mailing Address:	22801 Highway 58	Engineer:	Thom Maslowski
	Bakersfield, CA 93314	Lead Engineer:	Joven Refuerzo
Contact Person:	Scott Kinghorn		
Telephone:	(661) 328-4620		
Fax:	(661) 328-5930		
Application #(s):	S-2076-6-8		
Project #:	1104814		
Deemed Complete:	November 15, 2010		

I. Proposal

Frito Lay, Inc has requested an Authority to Construct (ATC) permit for the modification of the existing corn cleaning line listed under S-2076-6-7 to replace the Carter-Day screen with an Apex separator, replace Pulse-Jet fabric filter with a MAC Industries fabric collector and increase the throughput from 6 tons/hr to 9 tons/hr (equivalent to 216 tons/day).

Frito Lay, Inc received their Title V Permit on January 13, 2000. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Frito-Lay must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC issued with this project.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (12/18/08)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4202	Particulate Matter Emissions Rate (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The project is located at 22801 Highway 58, west of Bakersfield, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Corn is received at the facility by rail car and transferred into the existing 300 ton capacity storage silos. This corn is then sent through a corn cleaner to remove any unwanted material (dirt, corn hulls, twigs, etc.) prior to being stored in one of eight feed bins. Air flow from the various transfer points is routed to a fabric collector as part of the facility vector control and food safety sanitation activities. Material collected in the fabric collector is disposed of in a manner preventing re-entrainment into the atmosphere.

V. Equipment Listing

Pre-Project Equipment Description:

S-2076-6-7: CORN RECEIVING & STORAGE OPERATION INCLUDING RAILCAR UNLOADING, SILO INFEED CONVEYOR, SILO BUCKET ELEVATOR, SILO FEED DIVERTER, 3-600,000 LB STORAGE SILOS, 3-CORN HOPPER BUCKET ELEVATORS, CARTER-DAY SCREEN MACHINE, & PULSE-JET FABRIC FILTER W/36 BAGS

Proposed Modification:

S-2076-6-8: MODIFICATION OF CORN RECEIVING & STORAGE OPERATION INCLUDING RAILCAR UNLOADING, SILO INFEED CONVEYOR, SILO BUCKET ELEVATOR, SILO FEED DIVERTER, 3-600,000 LB STORAGE SILOS, 3-CORN HOPPER BUCKET ELEVATORS, CARTER-DAY SCREEN MACHINE, & PULSE-JET FABRIC FILTER W/36 BAGS: REPLACE CARTER-DAY SCREEN MACHINE WITH AN APEX MODEL A8G18-2M SEPARATOR, REPLACE EXISTING PULSE-JET FABRIC FILTER WITH A MAC INDUSTRIES MODEL 96RT52, STYLE III FABRIC COLLECTOR AND INCREASE CORN THROUGHPUT FROM 6 TONS/HR TO 9 TONS/HR (EQUIVALENT TO 216 TONS/DAY)

Post Project Equipment Description:

S-2076-6-8: CORN RECEIVING & STORAGE OPERATION INCLUDING RAILCAR UNLOADING, SILO INFEED CONVEYOR, SILO BUCKET ELEVATOR, SILO FEED DIVERTER, 3-600,000 LB STORAGE SILOS, 3-CORN HOPPER BUCKET ELEVATORS, APEX MODEL A8G18-2M SEPARATOR, AND MAC INDUSTRIES MODEL 96RT52, STYLE III FABRIC COLLECTOR

VI. Emission Control Technology Evaluation

Particulate matter less than 10 microns in aerodynamic diameter (PM_{10}) are the only pollutant of concern emitted from the almond sorting and packaging operation. A dust collector controls emission points for the entire facility. The dust collector is expected to have a control efficiency of 99% if properly designed.

Design check calculations:

Air Flow Calculations for the new MAC Industries Model 96RT52, Style III dust collector:

The total cloth area for the baghouse is 639 ft^2. This baghouse also utilizes a mechanical shaker to clean the bags at regular intervals.

Airflow: 3,000 ft^3/min (per Applicant)
Air/Cloth Ratio: = Air Flow Rate ÷ Cloth Area
= 3,000 cfm ÷ 639 ft^2 = 4.6 ft/min

According to the Air Pollution Control Manual (1992), p. 128, Table 5, typical air/cloth ratio for shaker filters range from 2.0 – 3.5. The calculated air/cloth ratio falls within the range of typical values; therefore proper control efficiencies are expected.

VII. General Calculations

A. Assumptions

- Total corn processed shall not exceed 6 tons/hour pre project (Current PTO)
- Post project total corn processed shall not exceed 9 tons/hour or 216 tons/day (Applicant)
- Existing baghouse operates at 3,250 cfm (Current PTO)
- Proposed dust collector operates at 3,000 cfm (Applicant)
- Facility operates 365 days a year (Current PTO)
- Emissions limit = 0.31 lb/hr (Current PTO)
- Pre and Post baghouse efficiency = 99% (Applicant)

B. Emission Factors

Pre project emission factor for PM10 = 0.011 gr/dscf
Post project emission factor for PM10 = 0.011 gr/dscf

C. Calculations

1. Pre-Project Potential to Emit (PE1)

The potential to emit for the operation is calculated as follows, and summarized in the table below:

PE1 = (3250 scfm) * (0.011 gr/scf) * (1 lb/ 7,000 gr) * (60 min/hr) * 24 hour/day
= 0.31 lb/hour * 24 hour/day
= 7.4 lb PM_{10}/day

PE1 = (3250 scfm) * (0.011 gr/scf) * (0.0001428 lb/gr) * (60 min/hr) * (24 hours/day) * (365 day/year)
= 2,716 lb PM_{10}/year

Pre-Project Potential to Emit (PE1)		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO_X	0	0
SO_X	0	0
PM_{10}	7.4	2,716
CO	0	0
VOC	0	0

2. Post Project Potential to Emit (PE2)

The potential to emit for the operation is calculated as follows, and summarized in the table below:

PE2 = (3000 scfm) * (0.011 gr/scf) * (0.0001428 lb/gr) * (60 min/hr) * 24 hour/day
= 0.282 lb/hour * 24 hour/day
= 6.8 lb PM_{10}/day

PE2 = (3000 scfm) * (0.011 gr/scf) * (0.0001428 lb/gr) * (60 min/hr) * (24 hours/day) * (365 day/year)
= 2,478 lb PM_{10}/year

Post Project Potential to Emit (PE2)		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO_X	0	0
SO_X	0	0
PM_{10}	6.8	2,478
CO	0	0
VOC	0	0

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The Pre-Project Stationary Source Potential to Emit (SSPE1) is summarized below (see Appendix B for details).

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
Pre-Project SSPE (SSPE1)	106,248	5,296	114,307	506,224	17,279

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The Post Project Stationary Source Potential to Emit (SSPE2) is summarized below (see Appendix C for details).

Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
Post Project SSPE (SSPE2)	106,248	5,296	114,069	506,224	17,279

5. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site."

This source is an existing Major Source for NOx and CO, emissions and will remain a Major Source for NOx and CO. No change in other pollutants are proposed or expected as a result of this project.

6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22 of District Rule 2201.

BE PM_{10}

Unit Located at a Non-Major Source
As shown in Section VII.C.5 above, the facility is not a major source for PM_{10} emissions.

Therefore Baseline Emissions (BE) are equal to the Pre-project Potential to Emit (PE1).

BE = PE1 = (3250 scfm) * (0.011 gr/scf) * (0.0001428 lb/gr) * (60 min/hr) * (24 hours/day) * (365 day/year)
= 2,716 lb PM_{10}/year

7. SB 288 Major Modification:

Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

As discussed in Section VII.C.5 above, the facility is an existing Major Source for NOx and CO; however, the project by itself would need to be a significant increase in order to trigger a Major Modification. The emissions unit(s) within this project do(es) not have a total potential to emit which is greater than Major Modification thresholds (see table below). Therefore, the project cannot be a significant increase and the project does not constitute a Major Modification.

Major Modification Thresholds (Existing Major Source)			
Pollutant	Project PE (lb/year)	Threshold (lb/year)	Major Modification?
NO_x	0	50,000	No
SO_x	0	80,000	No
PM_{10}	2,478	30,000	No
VOC	0	50,000	No

8. Federal Major Modification:

District Rule 2201, Section 3.17 states that major modifications are also federal major modifications, unless they qualify for either a "Less-Than-Significant Emissions Increase" exclusion or a "Plantwide Applicability Limit" (PAL) exclusion.

A Less-Than-Significant Emissions Increase exclusion is for an emissions increase for the project, or a Net Emissions Increase for the project (as defined in 40 CFR 51.165 (a)(2)(ii)(B) through (D), and (F)), that is not significant for a given regulated NSR pollutant, and therefore is not a federal major modification for that pollutant.

- To determine the post-project projected actual emissions from existing units, the provisions of 40 CFR 51.165 (a)(1)(xxviii) shall be used.

- To determine the pre-project baseline actual emissions, the provisions of 40 CFR 51.165 (a)(1)(xxxv)(A) through (D) shall be used.

- If the project is determined not to be a federal major modification pursuant to the provisions of 40 CFR 51.165 (a)(2)(ii)(B), but there is a reasonable possibility that the project may result in a significant emissions increase, the owner or operator shall comply with all of the provisions of 40 CFR 51.165 (a)(6) and (a)(7).

- Emissions increases calculated pursuant to this section are significant if they exceed the significance thresholds specified in the table below.

Significant Threshold (lb/year)	
Pollutant	Threshold (lb/year)
VOC	0
NO_x	0
PM_{10}	30,000
SO_x	80,000

The Net Emissions Increases (NEI) will be calculated below to determine if this project has significant emission increases.

BAE = Baseline Actual Emissions. The actual emissions created by the project during the baseline period.

PAE = Projected Actual Emissions. The post-project projected emissions of the units in this project.

BPE = Baseline Potential Emissions. The portion of the unit's emissions following the project that an existing unit *could have accommodated* during the baseline period (as defined in 40 CFR 51.165 (a)(1)(xxviii)(B)-3), excluding any emissions unrelated to this particular project, including any increased utilization due to product demand growth.

NEI = [PAE – (BPE – BAE)] – BAE
= PAE – BPE + BAE – BAE
= PAE – BPE

Since there is no NOx and CO emissions from this project the PAE, BPE, and BAE are zero. Therefore:

NEI = 0 – 0 = 0

Since the BPE is equal to or greater than the PAE, the NEI for this project will be less than or equal to zero. Therefore, this project cannot exceed any Federal Major Modification threshold and no further discussion is necessary.

9. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix E.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project; therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

AIPE = PE2 – HAPE

Where,
AIPE = Adjusted Increase in Permitted Emissions, (lb/day)
PE2 = Post-Project Potential to Emit, (lb/day)
HAPE = Historically Adjusted Potential to Emit, (lb/day)

HAPE = PE1 x (EF2/EF1)

Where,
PE1 = The emissions unit's Potential to Emit prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

AIPE = PE2 – (PE1 * (EF2 / EF1))

AIPE = 6.8 – (7.4 * (0.011/0.011))
= 6.8 – 7.4 * 1
= -0.6 lb/day

As demonstrated above, the AIPE is not greater than 2.0 lb/day for PM_{10} emissions; therefore BACT is not triggered.

d. Major Modification

As discussed in Section VII.C.7 above, this project does not constitute a Major Modification; therefore BACT is not triggered.

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

Offset Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
Post Project SSPE (SSPE2)	106,248	5,296	114,069	506,224	17,279
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	Yes	Yes	No

2. Quantity of Offsets Required

As seen above, the SSPE2 is greater than the offset thresholds for NOx, PM10 and CO; therefore offset calculations will be required for this project.

Per Sections 4.7.1 and 4.7.3, the quantity of offsets in pounds per year for NO_X, PM10 and CO is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,
PE2 = Post Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE)

As calculated in Section VII.C.6 above, the Baseline Emissions (BE) from this unit are equal to the Pre-Project Potential to Emit (PE1) since the unit is a Clean Emissions Unit.

The only pollutant emitted from this process is PM10 so only that pollutant shall be calculated for offsets.

Also, there is only one emissions unit associated with this project and there are no increases in cargo carrier emissions; therefore offsets can be determined as follows:

Offsets Required (lb-PM10/year) = ([PE2 – BE] + ICCE) x DOR

PE2 (PM10) = 2,478 lb/year
BE (PM10) = 2,716 lb/year
ICCE = 0 lb/year

Offsets Required (lb/year) = ([2,478 – 2,716] + 0) x DOR
= -238 lb PM10/year

As demonstrated in the calculation above, the amount of offsets is zero; therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:
a. Any new Major Source, which is a new facility that is also a Major Source,
b. Major Modifications,

c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
d. Any project which results in the offset thresholds being surpassed, and/or
e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

b. Major Modification

As demonstrated in VII.C.7, this project does not constitute a Major Modification; therefore, public noticing for Major Modification purposes is not required.

c. PE > 100 lb/day

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project; therefore public noticing is not required for this project for Potential to Emit Purposes.

d. Offset Threshold

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

Offset Threshold				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO_X	106,248	106,248	20,000 lb/year	No
SO_X	5,296	5,296	54,750 lb/year	No
PM_{10}	114,307	114,069	29,200 lb/year	No
CO	506,224	506,224	200,000 lb/year	No
VOC	17,279	17,279	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project

Stationary Source Potential to Emit (SSPE1), i.e. SSIPE = SSPE2 – SSPE1. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO_x	106,248	106,248	0	20,000 lb/year	No
SO_x	5,296	5,296	0	20,000 lb/year	No
PM_{10}	114,069	114,307	-238	20,000 lb/year	No
CO	506,224	506,224	0	20,000 lb/year	No
VOC	17,279	17,279	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

- Emissions Baghouse flowrate shall be maintained at 3,000 scfm. [District NSR Rule] Y
- Particulate matter emissions shall not exceed 6.7 lb/day. [District NSR Rule] Y
- Processed corn weight shall not exceed 216 tons/day. [District NSR Rule] Y

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

- Permittee shall monitor and record annually the apex separator and baghouse air flow rate. [District Rules 1070 and District Rule 2520, 9.3.2] Y
- The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Y

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition(s) will appear on the permit to operate:

- Records of dust collector maintenance, inspections, and repair shall be maintained. 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, 9.3.2] Y
- All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Y

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit pursuant to Section 3.20 of this rule:

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.

As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the the Title V administrative amendment application.

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule]

- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). As the corn cleaning line is vented to a fabric collector, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity; therefore, continued compliance is expected.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

$$\text{PM Conc. (gr/scf)} = \frac{\text{(PM emission rate) x (7,000 gr/lb)}}{\text{(Air flow rate) x (60 min/hr) x (24 hr/day)}}$$

PM_{10} emission rate = 6.8 lb/day. Assuming 100% of PM is PM_{10}
Exhaust Gas Flow = 3,000 scfm

PM Conc. (gr/scf) = [(6.8 lb/day) * (7,000 gr/lb)] ÷ [(3,000 ft^3/min) * (60 min/hr) * (24 hr/day)]
PM Conc. = 0.011 gr/scf

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions, since there are no green house gasses associated with this emission unit. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct S-2026-6-8 subject to the permit conditions on the attached draft Authority to Construct in Appendix D.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-2026-6-8	3020-5-G	> 1,000,000 gallons	$382.00

Appendices

A: Current PTO
B: SSPE1 Calculations
C: SSPE2 Calculations
D: Draft ATC
E: Quarterly Net Emissions Change
F: COC Form

APPENDIX A
Current PTO

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2076-6-7 **EXPIRATION DATE:** 06/30/2014

SECTION: 20 **TOWNSHIP:** 29S **RANGE:** 25E

EQUIPMENT DESCRIPTION:
CORN RECEIVING & STORAGE OPERATION INCLUDING RAILCAR UNLOADING, SILO INFEED CONVEYOR, SILO BUCKET ELEVATOR, SILO FEED DIVERTER, 3-600,000 LB STORAGE SILOS, 3-CORN HOPPER BUCKET ELEVATORS, CARTER-DAY SCREEN MACHINE, & PULSE-JET FABRIC FILTER W/36 BAGS

PERMIT UNIT REQUIREMENTS

1. Air flow from Carter-Day screen machine shall not exceed 200 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Processed corn weight shall not exceed 6 Tons/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All corn received at plant shall be precleaned prior to delivery. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All corn conveyors, bucket elevators, and transfer points shall be covered or fully enclosed during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Inspection hatches on conveying equipment shall remain closed at all times except as required for normal operating procedures. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Baghouse flowrate shall be maintained at a minimum of 3,250 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.31 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. If visible emissions from exhaust vents to the atmosphere are detected, compliance testing with particulate emissions rate shall be performed by District-witnessed sample collection, and official results/field data shall be submitted within 30 days of collection. [District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 4102 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. All equipment shall be maintained in good operation condition and shall be operated in a manner to minimize emission of air contaminants into the atmosphere. [District Rule 4102 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201 and District Rule 4202. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Dust collector filters shall be inspected quarterly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

15. Records of dust collector maintenance, inspections, and repair shall be maintained. 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, 9.3.2] Federally Enforceable Through Title V Permit

16. The exhaust vented to atmosphere shall be inspected quarterly during operation for visible emissions, using EPA Method 22. If visible emissions are observed, corrective action shall be taken. If visible emissions cannot be eliminated within one hour, an EPA Method 9 test shall be conducted within 24 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

17. Permittee shall maintain hourly records of processed corn weight and shall make such records available to the District upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

18. Permittee shall monitor and record annually the Carter-Day screen machine and baghouse air flow rate. [District Rules 1070 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

19. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

APPENDIX B
SSPE1 Calculations

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	NO_X	SO_X	PM_{10}	CO	VOC
S-2076-1-13	6,938	1,798	8,830	47,304	1892
S-2076-2	0	0	26,618	0	0
S-2076-3	0	0	12,352	0	0
S-2076-4-6	5,983	171	7,988	29,815	329
S-2076-5-6	5,983	171	7,988	29,815	329
S-2076-6	0	0	2,716	0	0
S-2076-7	0	0	0	0	0
S-2076-8	0	0	11,972	0	0
S-2076-9-xx	15,618	1,960	10,862	126,144	12,000
S-2076-10-4	0	0	6,132	0	0
S-2076-11	1,481	18	106	319	92
S-2076-12	1,481	18	106	319	92
S-2076-15	0	0	130	0	0
S-2076-16	0	0	0	0	0
S-2076-17-5	20,639	489	7,446	50,734	682
S-2076-18	29,784	263	3,154	32,047	788
S-2076-19	8,578	95	2,848	104,792	439
S-2076-20	4,417	0	533	60,481	224
S-2076-21-11	5,346	313	4,526	24,454	412
SSPE1 =	106,248	5,296	114,307	506,224	17,279

APPENDIX C
SSPE2 Calculations

Post-Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	NO_X	SO_X	PM_{10}	CO	VOC
S-2076-1-13	6,938	1,798	8,830	47,304	1892
S-2076-2	0	0	26,618	0	0
S-2076-3	0	0	12,352	0	0
S-2076-4-xx	5,983	171	7,988	29,815	329
S-2076-5-xx	5,983	171	7,988	29,815	329
S-2076-6	0	0	2,478	0	0
S-2076-7	0	0	0	0	0
S-2076-8	0	0	11,972	0	0
S-2076-9-XX	15,618	1,960	10,862	126,144	12,000
S-2076-10-4	0	0	6,132	0	0
S-2076-11	1,481	18	106	319	92
S-2076-12	1,481	18	106	319	92
S-2076-15	0	0	130	0	0
S-2076-16	0	0	0	0	0
S-2076-17-5	20,639	489	7,446	50,734	682
S-2076-18	29,784	263	3,154	32,047	788
S-2076-19	8,578	95	2,848	104,792	439
S-2076-20	4,417	0	533	60,481	224
S-2076-21-11	5,346	313	4,526	24,454	412
SSPE2 =	106,248	5,296	114,069	506,224	17,279

APPENDIX D
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2076-6-8 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: FRITO-LAY, INC.
MAILING ADDRESS: 28801 HIGHWAY 58
BAKERSFIELD, CA 93314-9000

LOCATION: 28801 HIGHWAY 58
BAKERSFIELD, CA 93314

SECTION: 20 **TOWNSHIP:** 29S **RANGE:** 25E

EQUIPMENT DESCRIPTION:
MODIFICATION OF CORN RECEIVING & STORAGE OPERATION INCLUDING RAILCAR UNLOADING, SILO INFEED CONVEYOR, SILO BUCKET ELEVATOR, SILO FEED DIVERTER, 3-600,000 LB STORAGE SILOS, 3-CORN HOPPER BUCKET ELEVATORS, CARTER-DAY SCREEN MACHINE, & PULSE-JET FABRIC FILTER W/36 BAGS: REPLACE CARTER-DAY SCREEN MACHINE WITH AN APEX MODEL A8G18-2M SEPARATOR, REPLACE EXISTING PULSE-JET FABRIC FILTER WITH A MAC INDUSTRIES MODEL 96RT52, STYLE III FABRIC COLLECTOR AND INCREASE CORN THROUGHPUT FROM 6 TONS/HR TO 9 TONS/HR (EQUIVALENT TO 216 TONS/DAY)

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The dust collector shall be maintained and operated according to manufacturer's specifications. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2076-6-8 : Jan 24 2011 3:49PM -- MASLOWST : Joint Inspection NOT Required

6. Visible emissions from the dust collector 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
7. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Air flow from apex separator shall not exceed 200 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Processed corn weight shall not exceed 216 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Emission factor from dust collector shall not exceed 0.011 gr/dscf for PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
12. All corn received at plant shall be precleaned prior to delivery. [District NSR Rule] Federally Enforceable Through Title V Permit
13. All corn conveyors, bucket elevators, and transfer points shall be covered or fully enclosed during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Inspection hatches on conveying equipment shall remain closed at all times except as required for normal operating procedures. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Dust collector flowrate shall be maintained at 3,000 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 6.7 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
18. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 4102 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. All equipment shall be maintained in good operation condition and shall be operated in a manner to minimize emission of air contaminants into the atmosphere. [District Rule 4102 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201 and District Rule 4202. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be inspected quarterly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Records of dust collector maintenance, inspections, and repair shall be maintained. 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, 9.3.2] Federally Enforceable Through Title V Permit
24. The exhaust vented to atmosphere shall be inspected quarterly during operation for visible emissions, using EPA Method 22. If visible emissions are observed, corrective action shall be taken. If visible emissions cannot be eliminated within one hour, an EPA Method 9 test shall be conducted within 24 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

25. Permittee shall maintain daily records of processed corn weight and shall make such records available to the District upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

26. Permittee shall monitor and record annually the apex separator and dust collector air flow rate. [District Rules 1070 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

27. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

DRAFT

APPENDIX E
Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

$PE2_{quarterly}$ = $PE2_{annual}$ ÷ 4 quarters/year
= 2,478 lb/year ÷ 4 qtr/year
= 620 lb PM_{10}/qtr

$PE1_{quarterly}$= $PE1_{annual}$ ÷ 4 quarters/year
= 2,716 lb/year ÷ 4 qtr/year
= 679 lb PM_{10}/qtr

Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO_X	0	0	0
SO_X	0	0	0
PM_{10}	620	679	-59
CO	0	0	0
VOC	0	0	0

APPENDIX F
COC Form

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

RECEIVED
NOV - 3 2010
SJVAPCD
Southern Region

☐ SIGNIFICANT PERMIT MODIFICATION ☐ ADMINISTRATIVE AMENDMENT
☒ MINOR PERMIT MODIFICATION

COMPANY NAME: **Frito Lay, Inc.**	FACILITY ID: **S – 2076**
1. Type of Organization: ☒ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☐ Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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

(KH) Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s).

(KH) Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

(KH) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(KH) 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

28 October, 2010
Date

Scott Kinghorn
Name of Responsible Official (please print)

Technical Manager
Title of Responsible Official (please print)

Modification of corn cleaning system.