



NOV 10 2011

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 # S-883
Project # S-1110988

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Rio Bravo Poso is proposing a Title V minor permit modification to incorporate the recently issued S-883-31-4 into the Title V operating permit. This modification authorizes the storing of biomass in an existing storage silo and revises the dust collector emissions factor.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-883-31-4, 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. Leonard Scandura at (661) 392-5500.

Sincerely,


David Warner
Director of Permit Services

Enclosures

Sayed 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



NOV 10 2011

William Rossiter
Rio Bravo Poso
P.O. Box 81027
Bakersfield, CA 93380-1027

**Re: Notice of Minor Title V Permit Modification
District Facility # S-883
Project # S-1110988**

Dear Mr. Rossiter:

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 S-883-31-4 into the Title V operating permit. This modification authorizes the storing of biomass in an existing storage silo and revises the dust collector emissions factor.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-883-31-4, 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. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1110988

Engineer: Kris Rickards
Date: November 7, 2011

Michael Buss
11/8/11

Facility Number: S-883
Facility Name: Rio Bravo Poso
Mailing Address: P.O. Box 81027
Bakersfield, CA 93380-1027

Contact Name: William Rossiter
Phone: 661-393-2278

Responsible Official: William Rossiter
Title: Director of Asset Operations

I. PROPOSAL

Rio Bravo Poso is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) number S-883-31-4 into the Title V operating permit. This ATC authorized the storing of biomass in an existing silo and revised the emission factors for the dust collector.

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

II. FACILITY LOCATION

16608 Porterville Hwy, Bakersfield, CA 93380

III. EQUIPMENT DESCRIPTION

S-883-31-5: 450 TON (15,000 FT³) CAPACITY REFINERY COKE AND/OR BIOMASS STORAGE SILO EQUIPPED WITH BHA MODEL SPJ-24-X4B8BV VENT FILTER BAGHOUSE, AND ENCLOSED PNEUMATIC SILO LOADING AND UNLOADING SYSTEMS

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Condition 1 on the PTO was replaced by condition 2 on the draft PTO:

~~Coke storage silo loading rate from trucks shall not exceed 240 tons/day. [District NSR Rule]~~ Bin vent shall operate with a volumetric air rate not to exceed 1,400 scfm. [District Rule 2201]

Note: The weight limiting condition was replaced with a volume limiting condition since the displaced volume is the source of emissions from the bin vent and the weight of biomass required for storage would be approximately twice that of other approved fuels due to the lower Btu content of the fuel.

Condition 2 on the PTO was modified to accurately reflect source tested emissions from the dust collector as follows and appears as condition 1 on the draft PTO:

Concentration of PM10 in coke and/or biomass storage silo baghouse exhaust shall not exceed ~~0.020~~ 0.006 gr/scf. [District ~~NSR Rules~~ 2201 and 4201]

Condition 3 on the PTO was modified to include biomass as follows and appears as condition 3 on the draft PTO:

There shall be no visible emissions during unloading of coke and/or biomass from silo to boiler. [District Rule 2201]

Condition 4 on the PTO was modified to include biomass as follows and appears as condition 4 on the draft PTO:

No air contaminant shall be discharged into the atmosphere from coke and/or biomass storage silo baghouse exhaust for a period or periods aggregating more than 3 minutes in any one hour which is dark or darker than Ringelmann 1/4 or equivalent to 5% opacity. [District Rules 2201 and 4101]

Condition 5 on the PTO was removed as it applies to the throughput limiting condition that is no longer listed on the permit:

~~Daily records of coke storage silo loading rate in tons/day shall be maintained, retained on-site for a period of at least five years and made available for District inspection upon request. [District NSR Rule and Rule 1070]~~

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

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

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit S-883-31-5
- B. Authorities to Construct S-883-31-4
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit S-883-31-3

ATTACHMENT A

Proposed Modified Title V Operating Permit
(S-883-31-5)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-883-31-5

EXPIRATION DATE: 01/31/2015

EQUIPMENT DESCRIPTION:

450 TON (15,000 FT³) CAPACITY REFINERY COKE AND/OR BIOMASS STORAGE SILO EQUIPPED WITH BHA MODEL SPJ-24-X4B8BV VENT FILTER BAGHOUSE, AND ENCLOSED PNEUMATIC SILO LOADING AND UNLOADING SYSTEMS

PERMIT UNIT REQUIREMENTS

1. Concentration of PM₁₀ in coke and/or biomass storage silo baghouse exhaust shall not exceed 0.006 gr/scf. [District NSR Rule and Rule 4201] Federally Enforceable Through Title V Permit
2. Bin vent shall operate with a volumetric air rate not to exceed 1,400 scfm. [District Rule 2201] Federally Enforceable Through Title V Permit
3. There shall be no visible emissions during unloading of coke and/or biomass from silo to boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be discharged into the atmosphere from coke and/or biomass storage silo baghouse exhaust for a period or periods aggregating more than 3 minutes in any one hour which is dark or darker than Ringelmann 1/4 or equivalent to 5% opacity. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
5. The bin vent filter located on top of the coke and/or biomass silo shall be inspected weekly during silo loading for any visible emissions. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions prior to further loading. Corrective action shall eliminate visible emissions before next loading event. The result of inspection shall be kept in a record and shall be made available to the District upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Permittee shall perform a complete vent filter inspection during each calendar quarter. Vent filters shall be inspected thoroughly 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
7. Records of vent filter 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
8. {2426} The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [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.

ATTACHMENT B

Authority to Construct
(S-883-31-4)

AUTHORITY TO CONSTRUCT

PERMIT NO: S-883-31-4

ISSUANCE DATE: 05/03/2011

LEGAL OWNER OR OPERATOR: RIO BRAVO POSO
MAILING ADDRESS: 19100 VON KARMAN, STE 570
IRVINE, CA 92612

LOCATION: 16608 PORTERVILLE HWY
BAKERSFIELD, CA 93308

EQUIPMENT DESCRIPTION:

MODIFICATION OF 450 TON (15,000 FT³) CAPACITY REFINERY COKE STORAGE SILO EQUIPPED WITH BHA MODEL SPJ-24-X4B8BV VENT FILTER BAGHOUSE, AND ENCLOSED PNEUMATIC SILO LOADING AND UNLOADING SYSTEMS: AUTHORIZE STORAGE OF BIOMASS AND/OR COKE

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] Federally Enforceable Through Title V Permit
2. Concentration of PM10 in coke and/or biomass storage silo baghouse exhaust shall not exceed 0.006 gr/scf. [District NSR Rule and Rule 4201]
3. Bin vent shall operate with a volumetric air rate not to exceed 1,400 scfm. [District Rule 2201]
4. There shall be no visible emissions during unloading of coke and/or biomass from silo to boiler. [District NSR Rule]
5. No air contaminant shall be discharged into the atmosphere from coke and/or biomass storage silo baghouse exhaust for a period or periods aggregating more than 3 minutes in any one hour which is dark or darker than Ringelmann 1/4 or equivalent to 5% opacity. [District NSR Rule and Rule 4101]
6. The bin vent filter located on top of the coke and/or biomass silo shall be inspected weekly during silo loading for any visible emissions. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions prior to further loading. Corrective action shall eliminate visible emissions before next loading event. The result of inspection shall be kept in a record and shall be made available to the District upon request. [District Rule 2520, 9.3.2]
7. Permittee shall perform a complete vent filter inspection during each calendar quarter. Vent filters shall be inspected thoroughly 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

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

DAVID WARNER, Director of Permit Services

S-883-31-4, Nov 4 2011 9:28AM - RICKARDK . Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

8. Records of vent filter 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
9. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-883-31	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

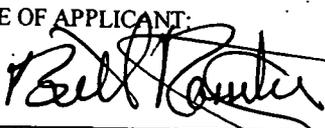
www.valleyair.org

Permit Application For:

RECEIVED

APR - 1 2011

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION
SJV APCD
 Sacramento Region

1. PERMIT TO BE ISSUED TO: Rio Bravo Poso	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>P. O. Box 81027</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93380-1027</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>16608 Porterville Hwy</u> CITY: <u>Bakersfield, CA</u> _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <u>4/2011</u>
4. GENERAL NATURE OF BUSINESS: Cogeneration of electricity and steam	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Permit #S-883-31-3: In Equipment Description and in Conditions 1, 2, 3, 4, 5, and 6 Add "and/or biomass" after the word "coke"	
6. TYPE OR PRINT NAME OF APPLICANT: Bill Rossiter	TITLE OF APPLICANT: Director of Asset Operations, Responsible Official
7. SIGNATURE OF APPLICANT:  DATE: <u>April 1, 2011</u>	PHONE: (661) 393-2278 FAX: (661) 393-2702 EMAIL:

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>S-1110988</u> FACILITY ID: <u>S-883</u>

T.411 V - Minor Mod

S-883-31-4

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

RECEIVED

I. TYPE OF PERMIT ACTION (Check appropriate box)

APR - 1 2011

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

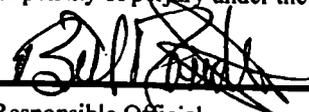
SJVAPCD
Southern Region

COMPANY NAME: Rio Bravo Poso	FACILITY ID: S - 883
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Same	
3. Agent to the Owner: N/A	

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

- 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).
- 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.
- 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 foregoing is correct and true:



Signature of Responsible Official

March 31, 2011

Date

Bill Rossiter

Name of Responsible Official (please print)

Director of Asset Operations

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit
(S-883-31-3)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-883-31-3

EXPIRATION DATE: 01/31/2015

EQUIPMENT DESCRIPTION:

450 TON (15,000 FT³) CAPACITY REFINERY COKE STORAGE SILO EQUIPPED WITH BHA MODEL SPJ-24-X4B8BV VENT FILTER BAGHOUSE, FEED AND TRUCK LOADING PNEUMATIC CONVEYOR SYSTEMS

PERMIT UNIT REQUIREMENTS

1. Coke storage silo loading rate from trucks shall not exceed 240 tons/day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Concentration of PM10 in coke storage silo baghouse exhaust shall not exceed 0.02 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. There shall be no visible emissions during unloading of coke from silo to boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
4. No air contaminant shall be discharged into the atmosphere from coke storage silo baghouse exhaust for a period or periods aggregating more than 3 minutes in any one hour which is dark or darker than Ringelmann 1/4 or equivalent to 5% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of coke storage silo loading rate in tons/day shall be maintained, retained on-site for a period of at least five years and made available for District inspection upon request. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit
6. The bin vent filter located on top of the coke silo shall be inspected weekly during silo loading for any visible emissions. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions prior to further loading. Corrective action shall eliminate visible emissions before next loading event. The result of inspection shall be kept in a record and shall be made available to the District upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
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9. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [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.