



JAN 9 2013

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 # N1123080**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Ingredion Incorporated is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-238-33-3 into the Title V operating permit. The proposed project was to modify the existing gluten dryer system by replacing a gluten cooler cyclone and airlock with a rotary drum gluten conditioner and associated conveying system.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-238-33-3, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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



JAN 9 2013

Roger Hoffdahl
Ingredion Incorporated
P O Box 6129
Stockton, CA 95206

**Re: Notice of Minor Title V Permit Modification
District Facility # N-238
Project # N1123080**

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-238-33-3 into the Title V operating permit. The proposed project was to modify the existing gluten dryer system by replacing a gluten cooler cyclone and airlock with a rotary drum gluten conditioner and associated conveying system.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-238-33-3, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,

David Warner
Director of Permit Services

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Title V APPLICATION REVIEW Minor Modification

Facility Number: N-238
Facility Name: Ingredion Incorporated
Mailing Address: P O Box 6129
Stockton, CA 95206

Contact Name: Roger Hoffdahl
Phone: (209) 547-8233 ext. 233
Fax: (559) 982-5012

Responsible Official: Juan Carlos Casillas
Title: Plant Manager

Processing Staff: Jag Kahlon
Project Number: N-1123080
Date: December 7, 2012

I. PROPOSAL

Ingredion Incorporated has proposed to incorporate Authority to Construct (ATC) permit N-238-33-3 into their Title V operating permit. The ATC permit was issued without Certificate of Conformity (COC). The proposed project was to modify the existing gluten dryer system by replacing a gluten cooler cyclone and airlock with a rotary drum gluten conditioner and associated conveying system. The gluten conditioner will be vented to the gluten dryer which is ducted to a wet scrubber via a cyclone to remove particulate matter trapped in the air stream. The discharge from the wet scrubber is followed by another wet scrubber for SO_x control. The laden stream is then discharged into the biofilters for SO_x and VOC control before being released into the atmosphere. The purpose of this project was to thoroughly cool down the gluten to prevent moisture condensation in the product, which led the formation of large gluten clumps in the silo that interrupts the gluten loadout operation.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for revising/including new permit conditions that were established under Permit to Operate (PTO) N-238-33-3.

II. FACILITY LOCATION

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

III. EQUIPMENT DESCRIPTION

N-238-33-4:

GLUTEN PROCESSING OPERATION CONSISTING OF GLUTEN DRYER (DAVENPORT MODEL RSTD), A GLUTEN CONDITIONER, AND ASSOCIATED CONVEYING SYSTEM. THE GLUTEN CONDITIONER IS VENTED TO THE GLUTEN DRYER WHICH IS SERVED BY A CYCLONE FOLLOWED BY A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER, AND A BIOTON MODEL 2-2-34 BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24)

IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification to the Title V permit because no relaxation was given to the existing monitoring, recordkeeping or reporting requirements, and the Authority to Construct (ATC) project N-1123028 (under which ATC N-238-33-3 was issued) was not an SB-288 or Federal major modification under Rule 2201. Therefore, public review is not required.

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

This section details the modifications made to the permit conditions in PTO N-238-33-2 during processing the project (N-1123028) that resulted in ATC N-238-33-3.

Equipment Description in PTO N-238-33-2

- DAVENPORT, MODEL RSTD, GLUTEN DRYER SERVED BY A CYCLONE, A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER, AND A BIOTON MODEL 2-2-34 BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24)

The equipment description is updated to the following:

- GLUTEN PROCESSING OPERATION CONSISTING OF GLUTEN DRYER (DAVENPORT MODEL RSTD), A GLUTEN CONDITIONER, AND ASSOCIATED CONVEYING SYSTEM. THE GLUTEN CONDITIONER IS VENTED TO THE GLUTEN DRYER WHICH IS SERVED BY A CYCLONE FOLLOWED BY A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER, AND A BIOTON MODEL 2-2-34 BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24)

No other changes were made to the existing requirements during the ATC project.

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-238-33-4
- Appendix II: Authority to Construct N-238-33-3
- Appendix III: Permit Application
- Appendix IV: Emissions Change
- Appendix V: Title V Permit to Operate N-238-33-2

Appendix I
Proposed Title V Operating Permit No. N-238-33-4

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-238-33-4

EXPIRATION DATE: 03/31/2014

EQUIPMENT DESCRIPTION:

GLUTEN PROCESSING OPERATION CONSISTING OF GLUTEN DRYER (DAVENPORT MODEL RSTD), A GLUTEN CONDITIONER, AND ASSOCIATED CONVEYING SYSTEM. THE GLUTEN CONDITIONER IS VENTED TO THE GLUTEN DRYER WHICH IS SERVED BY A CYCLONE FOLLOWED BY A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER, AND A BIOTON MODEL 2-2-34 BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. If the liquid to gas ratio of the scrubber is less than 4 gpm per 1,000 cfm during operation, the permittee shall correct the liquid to gas ratio to a minimum of 4 gpm per 1,000 cfm as soon as possible, but no longer than 1 hour of operation after detection. If the liquid to gas ratio continues to be less than 4 gpm per 1,000 cfm after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber and biofilter maintenance or a complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined SOx emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 1.25 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined VOC emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 0.33 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 1.04 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed through the bypass duct after the particulate scrubber and prior to the SOx scrubber in the event of SOx scrubber or biofilter maintenance, or for complete biofilter bed change out. [District NSR Rule] 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. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber or the biofilter. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The exhaust gases may be bypassed for a period not to exceed 340 hours per year for the complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
15. During operation the biofilter temperature shall not exceed 110 degrees F and shall not be less than 60 degrees F. [40 CFR part 64] Federally Enforceable Through Title V Permit
16. The temperature of the air flow through the biofilter media shall be monitored daily during operation. [40 CFR part 64] Federally Enforceable Through Title V Permit
17. The temperature gauge (probe) monitoring the air flow through the biofilter media shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
18. Biofilter shall be thoroughly inspected annually for biofilter media deterioration and shall be replaced or repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber and the biofilter or when a complete biofilter bed change out was performed. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Records of the SOx scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
21. Records of the PM10 particulate scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
22. Records of the biofilter temperature shall be observed and recorded daily, during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
23. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the scrubbers. [40 CF Part 64] Federally Enforceable Through Title V Permit
25. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
26. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] 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-238-33-3



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-238-33-3

ISSUANCE DATE: 11/20/2012

LEGAL OWNER OR OPERATOR: INGREDION INCORPORATED
MAILING ADDRESS: P O BOX 6129
STOCKTON, CA 95206

LOCATION: 1021 INDUSTRIAL DR
STOCKTON, CA 95206

EQUIPMENT DESCRIPTION:

MODIFICATION OF DAVENPORT, MODEL RSTD, GLUTEN DRYER SERVED BY A CYCLONE, A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER, AND A BIOTON MODEL 2-2-34 BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24); TO INSTALL A GLUTEN CONDITIONER AND ASSOCIATED CONVEYING SYSTEM. POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: GLUTEN PROCESSING OPERATION CONSISTING OF GLUTEN DRYER (DAVENPORT MODEL RSTD), A GLUTEN CONDITIONER, AND ASSOCIATED CONVEYING SYSTEM. THE GLUTEN CONDITIONER IS VENTED TO THE GLUTEN DRYER WHICH IS SERVED BY A CYCLONE FOLLOWED BY A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER, AND A BIOTON MODEL 2-2-34 BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24)

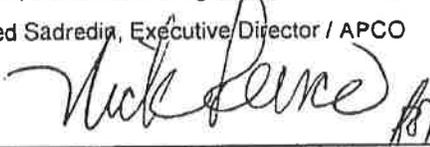
CONDITIONS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredia, Executive Director / APCO



DAVID WARNER, Director of Permit Services
N-238-33-3, Nov 20 2012 2:21PM - KAHLOLU - Joint Inspection NOT Required

6. If the liquid to gas ratio of the scrubber is less than 4 gpm per 1,000 cfm during operation, the permittee shall correct the liquid to gas ratio to a minimum of 4 gpm per 1,000 cfm as soon as possible, but no longer than 1 hour of operation after detection. If the liquid to gas ratio continues to be less than 4 gpm per 1,000 cfm after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber and biofilter maintenance or a complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined SOx emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 1.25 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined VOC emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 0.33 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 1.04 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed through the bypass duct after the particulate scrubber and prior to the SOx scrubber in the event of SOx scrubber or biofilter maintenance, or for complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber or the biofilter. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The exhaust gases may be bypassed for a period not to exceed 340 hours per year for the complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
15. During operation the biofilter temperature shall not exceed 110 degrees F and shall not be less than 60 degrees F. [40 CFR part 64] Federally Enforceable Through Title V Permit
16. The temperature of the air flow through the biofilter media shall be monitored daily during operation. [40 CFR part 64] Federally Enforceable Through Title V Permit
17. The temperature gauge (probe) monitoring the air flow through the biofilter media shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
18. Biofilter shall be thoroughly inspected annually for biofilter media deterioration and shall be replaced or repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber and the biofilter or when a complete biofilter bed change out was performed. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Records of the SOx scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
21. Records of the PM10 particulate scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. Records of the biofilter temperature shall be observed and recorded daily, during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
23. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the scrubbers. [40 CF Part 64] Federally Enforceable Through Title V Permit
25. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
26. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit

Appendix III
Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

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

{PRIVATE } 1. PERMIT TO BE ISSUED TO: INGREDION INCORPORATED	
2. MAILING ADDRESS: STREET/P.O. BOX: PO BOX 6129 CITY: Stockton STATE: CA 9-DIGIT ZIP CODE: 95206	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 1021 Industrial Drive CITY: Stockton NE ¼ SECTION 24 TOWNSHIP 1N RANGE 6E	INSTALLATION DATE: ASAP 2012
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) Modify District PTO N 238-33-2, GLUTEN DRYING SYSTEM. Rotary Steam Tube Dryer, Cyclone, Particulate Matter Scrubber, SOx Scrubber and a Bioton Biofilter. Return "decommissioned" equipment back to service for gluten product conditioning. Utilize former gluten dryer as a cooler by tumbling the product through it.	
6. TYPE OR PRINT NAME OF APPLICANT: Juan Carlos Casillas	TITLE OF APPLICANT: STOCKTON PLANT MANAGER
7. SIGNATURE OF APPLICANT: 	DATE: Sept. 17, 2012 PHONE: (209) 547-8226 FAX: (209) 982-5012 EMAIL: Juan.Casillas@comproducts.com

For APCD Use Only:

(PRIVATE) DATE STAMP RECEIVED SEP 20 2012 SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: <u>n/a</u>
	DATE PAID: _____
	PROJECT NO: <u>N1123080</u> FACILITY ID: <u>N-238</u>

Appendix IV
Emissions Change

Emissions Change

Emissions change under ATC project N-1123028 that resulted in ATC N-238-33-3 is summarized in the following table.

Emissions Change			
Pollutant	Annual PE2 (lb/yr)	Annual PE1 (lb/yr)	Quarterly IPE (lb/qtr)
NOx	0	0	0
SOx	10,950	10,950	0
PM ₁₀	9,125	9,125	0
CO	0	0	0
VOC	2,884	2,884	0

Appendix V
Title V Permit to Operate N-238-33-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-238-33-2

EXPIRATION DATE: 03/31/2014

EQUIPMENT DESCRIPTION:

DAVENPORT, MODEL RSTD, GLUTEN DRYER SERVED BY A CYCLONE, A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER, AND A BIOTON MODEL 2-2-34 BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. If the liquid to gas ratio of the scrubber is less than 4 gpm per 1,000 cfm during operation, the permittee shall correct the liquid to gas ratio to a minimum of 4 gpm per 1,000 cfm as soon as possible, but no longer than 1 hour of operation after detection. If the liquid to gas ratio continues to be less than 4 gpm per 1,000 cfm after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber and biofilter maintenance or a complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined SOx emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 1.25 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined VOC emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 0.33 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 1.04 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed through the bypass duct after the particulate scrubber and prior to the SOx scrubber in the event of SOx scrubber or biofilter maintenance, or for complete biofilter bed change out. [District NSR Rule] 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. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber or the biofilter. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The exhaust gases may be bypassed for a period not to exceed 340 hours per year for the complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
15. During operation the biofilter temperature shall not exceed 110 degrees F and shall not be less than 60 degrees F. [40 CFR part 64] Federally Enforceable Through Title V Permit
16. The temperature of the air flow through the biofilter media shall be monitored daily during operation. [40 CFR part 64] Federally Enforceable Through Title V Permit
17. The temperature gauge (probe) monitoring the air flow through the biofilter media shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
18. Biofilter shall be thoroughly inspected annually for biofilter media deterioration and shall be replaced or repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber and the biofilter or when a complete biofilter bed change out was performed. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Records of the SOx scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
21. Records of the PM10 particulate scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
22. Records of the biofilter temperature shall be observed and recorded daily, during operation of this unit. The records shall include identification of the equipment, date of inspection, corrective action taken and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
23. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the scrubbers. [40 CF Part 64] Federally Enforceable Through Title V Permit
25. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
26. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit

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