



NOV 21 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-2076
Project # S-1114136

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Frito-Lay, Inc., located at 28801 Highway 58, Bakersfield, which has been issued a Title V permit. Frito-Lay, Inc. is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The application is to add a 0.2 MMBtu/hr burner to the bake line #1 oven.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # S-2076-17-7 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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,


David Warner
Director of Permit Services

Enclosures
cc: Michael Buss, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
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NOV 21 2011

Scott Kinghorn
Frito-Lay, Inc.
28801 Highway 58
Bakersfield, CA 93314-9000

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-2076
Project # S-1114136**

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 application is to add a 0.2 MMBtu/hr burner to the bake line #1 oven.

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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

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II. Applicable Rules

- Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
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)
- Rule 4301 Fuel Burning Equipment (12/17/92)
Exempt, baking ovens use direct heat transfer
- Rule 4305 Boilers, Steam Generators and Process Heaters – Phase II (8/21/03)
Exempt per 3.14, baking ovens are not process heaters
- Rule 4306 Boilers, Steam Generators and Process Heaters – Phase III (10/16/08)
Exempt per 3.15, baking ovens are not process heaters
- Rule 4309 Dryers, Dehydrators, and Ovens (12/15/05)
Exempt per 4.1.4, units used to bake/fry food for human consumption
- Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
Exempt per 3.19 baking ovens are not process heaters
- Rule 4693 Bakery Ovens (5/16/2002)
Not applicable. This rule only applies to bakery ovens. Section 3.1 defines bakery oven as "an enclosed compartment supplied with heat, ... used to bake bread, buns and rolls". Frito-Lay uses this equipment to produce potato chips.
- Rule 4801 Sulfur Compounds (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 and there is no increase in any toxic air contaminant proposed or expected with this project approval. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Nixtamalized corn is milled to create a sheeted masa that is then cut into shapes and presented to a "toaster" oven, where the product is "seared" to prevent moisture loss internally while creating a toasted crust externally. The product is then moved from the toasting oven into a proprietary process to produce a fried or baked chip.

The applicant has determined by testing, that they receive the best results when using the first six burners in the "Primary" zone (1-6) and the first 5 positions in the "Secondary" zone (9-13). As a measure of redundancy they are proposing to leave the oven with a total of 13 burners, one redundant Primary in position 7, and one redundant Secondary in position 14. Positions 8, 15 and 16 will remain empty.

V. Equipment Listing

Pre-Project Equipment Description:

PTO S-2076-17-6: BAKED LINE #1 INCLUDING A 9.56 MMBTU/HR NATURAL GAS-FIRED BAKING OVEN, 10 MMBTU/HR NATURAL GAS-FIRED PRIMARY DRYER, STEAM HEATED FRYER WITH OIL MIST ELIMINATOR AND AMBIENT AIR COOLER

Proposed Modification:

PTO S-2076-17-7: MODIFICATION OF BAKED LINE #1 INCLUDING A 9.56 MMBTU/HR NATURAL GAS-FIRED BAKING OVEN, 10 MMBTU/HR NATURAL GAS-FIRED PRIMARY DRYER, STEAM HEATED FRYER WITH OIL MIST ELIMINATOR AND AMBIENT AIR COOLER: ADD 0.2 MMBTU/HR BURNER AND REPOSITION EXISTING BURNERS IN BAKING OVEN

Post Project Equipment Description:

PTO S-2076-17-7: BAKED LINE #1 INCLUDING A 9.76 MMBTU/HR NATURAL GAS-FIRED BAKING OVEN, 10 MMBTU/HR NATURAL GAS-FIRED PRIMARY DRYER, STEAM HEATED FRYER WITH OIL MIST ELIMINATOR AND AMBIENT AIR COOLER

VI. Emission Control Technology Evaluation

No emissions increases or changes in control equipment are proposed or expected with this project approval.

No modifications to the existing bake line burners are proposed with this project. The reconfiguration of the burner replacements with the addition of a new burner is not associated with any air pollution control equipment; therefore an emission control technology evaluation is not required.

VII. General Calculations

A. Assumptions

Natural gas fuel = 1,000 Btu/scf.

No change in maximum Bake oven natural gas fuel use.

$$9.56 \text{ MMBtu/hr} \times \text{scf}/1000 \text{ btu} = 9,560 \text{ scf/hr}$$

No change in Dryer natural gas fuel use.

$$10 \text{ MMBtu/hr} \times \text{scf}/1000 \text{ btu} = 10,000 \text{ scf/hr.}$$

Total natural gas fuel used in oven and dryer combined = $19,560 \text{ scf/hr} \times 24\text{hr/day} = 469,440 \text{ scf/day}$.

The applicant has stated (see Nov 15, 2011 email) that the oven and dryer each have their own fuel meter. Therefore the fuel to the oven will be limited to $9.56 \text{ MMBtu/hr} \times 24\text{hr/day} = 229.44 \text{ MMBtu/day}$.

Units may operate 24 hours/day 365 days per year.

B. Emission Factors

Baking Oven

Pollutant	Post- project Emission Factors (EF2)*	
NO _x	0.1 lb-NO _x /MMBtu	PTO
SO _x	0.00285 lb-SO _x /MMBtu	PTO
PM10	0.012 lb-PM10/MMBtu	PTO
CO	0.292 lb-CO/MMBtu	PTO
VOC	0.005 lb-VOC/MMBtu	PTO

Dryer

Pollutant	Post- project Emission Factors (EF2)*	
NO _x	0.14 lb-NO _x /MMBtu	PTO
SO _x	0.00285 lb-SO _x /MMBtu	PTO
PM10	0.014 lb-PM10/MMBtu	PTO
CO	0.300 lb-CO/MMBtu	PTO
VOC	0.003 lb-VOC/MMBtu	PTO

* equivalent emissions factor for calculation purposes – permit limits are in lb/hr

fryer: 0.4 lb PM10/hr

air cooler: 0.19 lb PM10/hr

C. Calculations

1. Pre-Project Potential to Emit (PE1)

S-2076-17 (oven)

Pollutant	Daily PE1			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE1 (lb/day)
NO _x	0.100	9.56	24	22.9
SO _x	0.00285	9.56	24	0.7
PM ₁₀	0.0120	9.56	24	2.8
CO	0.292	9.56	24	67.0
VOC	0.0050	9.56	24	1.1

Pollutant	Annual PE1			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE1 (lb/year)
NO _x	0.100	9.56	8,760	8,375
SO _x	0.00285	9.56	8,760	239
PM ₁₀	0.0120	9.56	8,760	1,005
CO	0.292	9.56	8,760	24,454
VOC	0.0050	9.56	8,760	419

S-2076-17 (dryer)

Pollutant	Daily PE1			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE1 (lb/day)
NO _x	0.140	10	24	33.6
SO _x	0.00285	10	24	0.7
PM ₁₀	0.0140	10	24	3.4
CO	0.300	10	24	72.0
VOC	0.0030	10	24	0.7

Pollutant	Annual PE1			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE1 (lb/year)
NO _x	0.140	10	8,760	12,264
SO _x	0.00285	10	8,760	250
PM ₁₀	0.0140	10	8,760	1,226
CO	0.300	10	8,760	26,280
VOC	0.0030	10	8,760	263

fryer 0.4 lb PM₁₀/hr x 24 hr/day = 9.6 lb PM₁₀/day

air cooler 0.19 lb PM₁₀/hr x 24 = 4.6 lb PM₁₀/day

Total PM₁₀ emissions = 1,005 + 1,226 + (0.4 * 8,760) + (0.19 x 8,760) = 7,339 lb/yr

S-2076-17-6

Pre-Project Potential to Emit (PE1) PTO S-2076-17-6		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO _x	56.5	20,639
SO _x	1.4	489
PM ₁₀	20.4	7,399
CO	139	51,169
VOC	1.8	682

2. Post Project Potential to Emit (PE2)

ATC S-2076-17-7 (oven)

Pollutant	Daily PE2 (fuel limited to 9.56 MMBtu/hr)			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr) <i>See note below</i>	Operating Schedule (hr/day)	Daily PE1 (lb/day)
NO _x	0.100	9.56	24	22.9
SO _x	0.00285	9.56	24	0.7
PM ₁₀	0.0120	9.56	24	2.8
CO	0.292	9.56	24	67.0
VOC	0.0050	9.56	24	1.1

Pollutant	Annual PE2			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE1 (lb/year)
NO _x	0.100	9.56	8,760	8,375
SO _x	0.00285	9.56	8,760	239
PM ₁₀	0.0120	9.56	8,760	1,005
CO	0.292	9.56	8,760	24,454
VOC	0.0050	9.56	8,760	419

Note: With the additional 0.2 MMBtu burner added in this project, the maximum rating of all oven burners combined is 9.76 MMBtu/hr. However, no increase in fuel use is proposed, therefore the emissions were calculated using 9.56 MMBtu/hr of natural gas. A fuel use restriction will be placed on the ATC and PTO to ensure compliance.

ATC S-2076-17-7 (dryer)

Pollutant	Daily PE2			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE1 (lb/day)
NO _x	0.140	10	24	33.6
SO _x	0.00285	10	24	0.7
PM ₁₀	0.0140	10	24	3.4
CO	0.300	10	24	72.0
VOC	0.0030	10	24	0.7

Pollutant	Annual PE2			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE1 (lb/year)
NO _x	0.140	10	8,760	12,264
SO _x	0.00285	10	8,760	250
PM ₁₀	0.0140	10	8,760	1,226
CO	0.300	10	8,760	26,280
VOC	0.0030	10	8,760	263

fryer 0.4 lb PM₁₀/hr x 24 hr/day = 9.6 lb PM₁₀/day

air cooler 0.19 lb PM₁₀/hr x 24 = 4.6 lb PM₁₀/day

Total PM₁₀ emissions = 1,005 + 1,226 + (0.4 * 8,760) + (0.19 x 8,760) = 7,339 lb/yr

ATC S-2076-17-7

Post-Project Potential to Emit (PE2) ATC S-2076-17-7		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO _x	56.5	20,639
SO _x	1.4	489
PM ₁₀	20.4	7,399
CO	139	51,169
VOC	1.8	682

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.

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
S-2076-1-14	6938	1798	8830	47304	1892
'-2-8	0	0	26618	0	0
'-3-8	0	0	12352	0	0
'-4-8	5983	171	7957	29915	329
'-5-8	5983	171	7957	29915	329
'-6-8	0	0	2716	0	0
'-7-5	0	0	0	0	0
'-8-10	0	0	11972	0	0
'-9-10	109324	1960	10862	126144	12000
'-10-5	0	0	6132	0	0
'-11-6	1481	18	106	319	92
'-12-6	1481	18	106	319	92
'-15-4	0	0	130	0	0
'-16-4	0	0	0	0	0
'-17-6	20639	489	7446	50734	682
'-18-5	29784	263	3154	32047	788
'-19-14	8578	95	2848	104792	439
'-20-10	4417	0	533	60481	224
'-21-14	5346	313	4526	24454	412
Pre-Project SSPE (SSPE1)	199,954	5,296	114,245	506,424	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.

Post-Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
S-2076-1-14	6938	1798	8830	47304	1892
'-2-8	0	0	26618	0	0
'-3-8	0	0	12352	0	0
'-4-8	5983	171	7957	29915	329
'-5-8	5983	171	7957	29915	329
'-6-8	0	0	2716	0	0
'-7-5	0	0	0	0	0
'-8-10	0	0	11972	0	0
'-9-10	109324	1960	10862	126144	12000
'-10-5	0	0	6132	0	0
'-11-6	1481	18	106	319	92
'-12-6	1481	18	106	319	92
'-15-4	0	0	130	0	0
'-16-4	0	0	0	0	0
ATC '-17-7	20639	489	7446	50734	682
'-18-5	29784	263	3154	32047	788
'-19-14	8578	95	2848	104792	439
'-20-10	4417	0	533	60481	224
'-21-14	5346	313	4526	24454	412
Post-Project SSPE (SSPE2)	199,954	5,296	114,245	506,424	17,279

5. Major Source Determination

Pursuant to Section 3.23 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 3.23.2 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 NO_x and CO emissions and will remain a Major Source for NO_x and CO. No change in other pollutants are proposed or expected as a result of this project.

Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Pre-Project SSPE (SSPE1)	199,954	5,296	114,245	506,424	17,279
Post Project SSPE (SSPE2)	199,954	5,296	114,245	506,424	17,279
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	Yes	No

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.

Pursuant to Rule 2201, Section 3.12, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

The baking oven is a clean emissions unit for NO_x and CO as it satisfies the current achieved-in-practice BACT requirements of Guideline 1.6.4 (see Appendix B) Oven-Snack Food – natural gas and LPG as backup fuel (achieved-in-practice). Therefore BE = PE1.

Baseline Emissions [BE] (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
S-2076-17	20639	489	7446	50734	682

7. SB 288 Major Modification

SB 288 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 NO_x 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 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 SB 288 Major Modification.

SB 288 Major Modification Thresholds (Existing Major Source)			
Pollutant	Project PE (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO _x	0	50,000	No
SO _x	0	80,000	No
PM ₁₀	0	30,000	No
VOC	0	50,000	No

8. Federal Major Modification

As discussed in Section VII.C.5 above, the facility is not a Major Source for SO_x, PM₁₀ and VOC emissions; therefore, the project does not constitute a Federal Major Modification for SO_x, PM₁₀ and VOC emissions.

District Rule 2201, Section 3.17 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The proposed modification, to add a 0.2 MMBtu/hr burner and restrict the fuel use to pre-project levels, does not result in an increase in potential to emit for NO_x or CO emissions either. Therefore the unused baseline capacity emissions (portion of PAE that unit could have accommodated) can also be excluded from the project Net Emissions Increase (NEI) calculation as follows:

$$\text{NEI} = \text{PAE} - \text{BAE} - \text{unused baseline capacity emissions}$$

The District has determined that the unit could have emitted PAE during the baseline period (when it emitted BAE) and therefore the unused baseline emissions are equal to PAE - BAE and NEI = 0.

Therefore the project is not a Federal Major Modification for any pollutant.

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. The QNEC was calculated as follows:

$$\text{QNEC} = \text{PE2} - \text{PE1}, \text{ where:}$$

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:

$$\text{PE2}_{\text{quarterly}} = \text{PE2}_{\text{annual}} \div 4 \text{ quarters/year}$$

$$\text{PE1}_{\text{quarterly}} = \text{PE1}_{\text{annual}} \div 4 \text{ quarters/year}$$

Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO _x	20,639/4 = 5,160	5,160	0
SO _x	489/4 = 122	122	0
PM ₁₀	7,399/4 = 1,850	1,850	0
CO	51,169/4 = 12,792	12,792	0
VOC	689/4 = 172	172	0

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. Unless exempted pursuant to Section 4.2, BACT shall be required for the following actions*:

- 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 an SB288 Major Modification or a Federal Major Modification, as defined by the rule.

*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

There is a new emissions unit (burner) associated with this project; however the emissions from the new burner are less than 2 lb/day, 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

As discussed in Section I above, there are no modified emissions units associated with this project; therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.7 above, this project does not constitute a SB 288 and/or Federal Major Modification for NO_x emissions; therefore BACT is not triggered for any pollutant.

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements are triggered on a pollutant by pollutant basis and 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.

Pursuant to District Policy APR 1130, IPEs that round to 0.5 lb/day (or less) are set to zero for purposes of providing emission offsets. Because no increases in emissions are proposed for this project, offsets for the emissions from the new 0.2 MMBtu/hr burner are not required.

Therefore no further discussion required.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB288 Major Mods,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Mods and SB288 Major Mods

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.

As demonstrated in VII.C.7, this project does not constitute a SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. 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. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

c. 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	199,954	199,954	20,000 lb/year	No
SO _x	5,296	5,296	54,750 lb/year	No
PM ₁₀	114,245	114,245	29,200 lb/year	No
CO	506,424	506,424	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.

d. 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	199,954	199,954	0	20,000 lb/year	No
SO _x	5,296	5,296	0	20,000 lb/year	No
PM ₁₀	114,245	114,245	0	20,000 lb/year	No
CO	506,424	506,424	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.

Proposed Rule 2201 (DEL) Conditions:

New condition:

- *Natural gas fuel used in baking oven shall not exceed 229.44 MMBtu/day. [District Rule 2201]*

Existing conditions on current permit (unchanged)

4. *Particulate matter (PM-10) emissions from the ambient air cooler shall not exceed 0.19 lb/hr. [District Rule 2201]*
5. *Particulate matter (PM-10) emissions from the fryer shall not exceed 0.40 lb/hr. [District Rule 2201]*
6. *Emissions from the baking oven shall not exceed any of the following: PM-10 - 0.12 lb/hr; SOx (as SO₂) - 0.03 lb/hr; NOx (as NO₂) - 0.97 lb/hr; CO - 2.84 lb/hr; or VOC - 0.05 lb/hr. [District Rule 2201]*
7. *Emissions from the primary dryer shall not exceed any of the following: PM-10 - 0.14 lb/hr; SOx (as SO₂) - 0.03 lb/hr; NOx (as NO₂) - 1.40 lb/hr; CO - 3.00 lb/hr; or VOC - 0.03 lb/hr. [District Rule 2201]*

E. Compliance Assurance

1. Source Testing

The following source testing conditions will remain on the permit. No changes are being made to the conditions except to remove wording which should have been removed at the time the previous ATC was implemented. (See strikeout wording below for PTO condition # 9).

9. *Compliance with fryer emission limit shall be demonstrated by District witnessed sample collection ~~within 60 days of startup and not less than once every two years thereafter.~~ [District Rules 1081 and District Rule 2201]*
10. *Source testing to demonstrate compliance with NO_x and CO emission limits of the baking oven and primary dryer shall be conducted within 60 days of startup, and not less than once every 12 months thereafter, except as provided below. [District Rule 2201]*
11. *Source testing to demonstrate compliance with NO_x and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rule 2201]*
12. *If permittee fails any compliance demonstration for NO_x and CO emission limits when testing not less than once every 36 months, compliance with NO_x and CO emission limits shall be demonstrated not less than once every 12 months. [District Rule 2201]*
13. *Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081]*
14. *Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]*
15. *The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]*
16. *The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, Particulates - EPA Method 5 (TSP) or EPA Method 201A (PM₁₀), Stack gas velocity - EPA Method 1, Stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and Stack gas moisture - EPA Method 4. [District Rule 1081 and District Rule 2201]*
17. *Stack gas volume of individual exhaust stacks shall be determined using EPA Reference Method 2. [District Rule 1081 and District Rule 2201]*

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset; public notification and daily emission limit requirements of Rule 2201. The following conditions, already listed on the permit, will continue to appear on the permit:

18. *Permittee shall maintain daily records of type and volume of fuel burned in baking oven, and such records shall be available for District inspection. [District Rule 2520, 9.3.2]*
20. *Permittee shall maintain copies of natural gas bills which shall be made available for District inspection upon request. [District Rule 2520, 9.3.2]*
21. *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 & District Rule 2520, 9.4.2]*

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

G. Compliance Certification

Section 4.15.2 of this Rule requires the owner of a new Major Source or a source undergoing a federal major modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. As discussed in Sections VIII-Rule 2201-C.1.a and VIII-Rule 2201-C.1.b, this facility is not a new major source and this project does constitute a federal major modification, therefore this requirement is not applicable.

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 completion of the EPA 45 notice and submittal of the Title V administrative amendment application.

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).

Equipment is fired on natural gas; therefore visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility 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 toxic air contaminant 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 > 0.1 grain per dry standard cubic foot.

No change in permitted PM10 emissions is proposed or expected. Therefore, continued compliance with this rule is expected.

Rule 4202 Particulate Matter Emission Rate

Rule 4202 establishes PM emission limits as a function of process weight rate in tons/hr.

No changes in throughput or PM10 emissions is proposed or expected as a result of this project approval. Therefore, continued compliance with the requirements of this rule is expected.

Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO₂, on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = \frac{n RT}{P}$$

With:

N = moles SO₂

T (Standard Temperature) = 60°F = 520°R

P (Standard Pressure) = 14.7 psi

R (Universal Gas Constant) = $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$

$$\frac{0.00285 \text{ lb} - \text{SO}_x}{\text{MMBtu}} \times \frac{\text{MMBtu}}{8,578 \text{ dscf}} \times \frac{1 \text{ lb} \cdot \text{mol}}{64 \text{ lb}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times \frac{1,000,000 \cdot \text{parts}}{\text{million}} = 1.97 \frac{\text{parts}}{\text{million}}$$

$$\text{Sulfur Concentration} = 1.97 \frac{\text{parts}}{\text{million}} < 2,000 \text{ ppmv (or 0.2\%)}$$

Therefore, continued compliance with District Rule 4801 requirements is expected.

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 Significance Determination

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

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. Pending a successful EPA COC Noticing period, issue Authority to Construct S-2076-17-7 subject to the permit conditions on the attached draft Authority to Construct in Appendix E. Also correct the billing schedule from 9.7 to 19,760 kBtu/hr.

X. Billing Information

The billing fee is based on the total heat input of all burners combined (9.76 MMBtu/hr).

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-2076-17-7	3020-02-G	19.76 MMBtu/hr	\$ 815.00 1030

Appendices

- A: Current PTO
- B: BACT Guideline 1.6.4 (for determining unit is a clean unit)
- C: Emission Profiles
- D: Certificate of Conformity
- E: Draft Authority to Construct

APPENDIX A

**Pre-project Permit
S-2076-17-6**

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2076-17-6

EXPIRATION DATE: 06/30/2014

EQUIPMENT DESCRIPTION:

BAKED LINE #1 INCLUDING A 9.56 MMBTU/HR NATURAL GAS-FIRED BAKING OVEN, 10 MMBTU/HR NATURAL GAS-FIRED PRIMARY DRYER, STEAM HEATED FRYER WITH OIL MIST ELIMINATOR AND AMBIENT AIR COOLER

PERMIT UNIT REQUIREMENTS

1. All burners shall be fired exclusively on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Particulate matter (PM-10) emissions from the ambient air cooler shall not exceed 0.19 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter (PM-10) emissions from the fryer shall not exceed 0.40 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Emissions from the baking oven shall not exceed any of the following: PM-10 - 0.12 lb/hr; SOx (as SO2) - 0.03 lb/hr; NOx (as NO2) - 0.97 lb/hr; CO - 2.84 lb/hr; or VOC - 0.05 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from the primary dryer shall not exceed any of the following: PM-10 - 0.14 lb/hr; SOx (as SO2) - 0.03 lb/hr; NOx (as NO2) - 1.40 lb/hr; CO - 3.00 lb/hr; or VOC - 0.03 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
9. Compliance with fryer emission limit shall be demonstrated by District witnessed sample collection within 60 days of startup and not less than once every two years thereafter. [District Rules 1081 and District NSR Rule] Federally Enforceable Through Title V Permit
10. Source testing to demonstrate compliance with NOx and CO emission limits of the baking oven and primary dryer shall be conducted within 60 days of startup, and not less than once every 12 months thereafter, except as provided below. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Source testing to demonstrate compliance with NOx and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District NSR Rule] Federally Enforceable Through Title V Permit
12. If permittee fails any compliance demonstration for NOx and CO emission limits when testing not less than once every 36 months, compliance with NOx and CO emission limits shall be demonstrated not less than once every 12 months. [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.

Facility Name FRITO-LAY, INC.
Location: 28801 HIGHWAY 58, BAKERSFIELD, CA 93314
S-2076-17-6; Nov 14 2011 8:14AM - 8:35AM

Permit Unit Requirements for S-2076-17-6 (continued)

Page 2 of 2

13. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, Particulates - EPA Method 5 (TSP) or EPA Method 201A (PM₁₀), Stack gas velocity - EPA Method 1, Stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and Stack gas moisture - EPA Method 4. [District Rule 1081 and District NSR Rule] Federally Enforceable Through Title V Permit
17. Stack gas volume of individual exhaust stacks shall be determined using EPA Reference Method 2. [District Rule 1081 and District NSR Rule] Federally Enforceable Through Title V Permit
18. Permittee shall maintain daily records of type and volume of fuel burned, and such records shall be available for District inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Compliance with the conditions in the Title V permit shall be deemed compliance with the following requirements: Rule 1081, 4201, 4801. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Permittee shall maintain copies of natural gas bills which shall be made available for District inspection upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. 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 & 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.

Facility Name: FRITO-LAY, INC.
Location: 28801 HIGHWAY 58, BAKERSFIELD, CA 93314
S-2076-17-6 - Nov 14 2011 8:14AM - BJESM

APPENDIX B
BACT Guideline 1.6.4

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 1.6.4*

Last Update 6/16/1999

Oven - Snack Food

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
CO	Natural gas and LPG as backup fuel	Catalytic Oxidation	
NOx	Natural gas and LPG as backup fuel	Selective Catalytic Reduction	
PM10	Natural gas and LPG as backup fuel		
SOx	Natural gas and LPG as backup fuel		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

APPENDIX C
Emission Profile

SJVUAPCD
SOUTHERN

Application Emissions

11/14/11
8:12 am

Permit #: S-2076-17-7	Last Updated
Facility: FRITO-LAY, INC.	11/14/2011 BUSSM

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	20639.0	489.0	7446.0	50734.0	682.0
Daily Emis. Limit (lb/Day)	56.5	1.4	20.4	139.0	1.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

APPENDIX D
Certificate of Conformity

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Frito-Lay, Inc.	FACILITY ID: S - 2076
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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

- Based on information and belief formed after reasonable inquiry, the 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 forgoing is correct and true:



Signature of Responsible Official

27 September, 2011

Date

Scott Kinghorn
Name of Responsible Official (please print)

Technical Manager
Title of Responsible Official (please print)

Add burner to oven on Bake Line #1.

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

TVFORM-009

APPENDIX E

Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: S-2076-17-7

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

LOCATION: 28801 HIGHWAY 58
BAKERSFIELD, CA 93314

EQUIPMENT DESCRIPTION:

MODIFICATION OF BAKED LINE #1 INCLUDING A 9.56 MMBTU/HR NATURAL GAS-FIRED BAKING OVEN, 10 MMBTU/HR NATURAL GAS-FIRED PRIMARY DRYER, STEAM HEATED FRYER WITH OIL MIST ELIMINATOR AND AMBIENT AIR COOLER: ADD 0.2 MMBTU/HR BURNER AND REPOSITION EXISTING BURNERS IN BAKING OVEN

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 Rule 2201] 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. All burners shall be fired exclusively on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions from the ambient air cooler shall not exceed 0.19 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Particulate matter (PM-10) emissions from the fryer shall not exceed 0.40 lb/hr. [District Rule 2201] 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-2076-17-7 Nov 14 2011 9:37AM - BUSSEM - Joint Inspection Required with BUSSEM

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

8. Natural gas fuel used in baking oven shall not exceed 229.44 MMBtu/day. [District Rule 2201]
9. Emissions from the baking oven shall not exceed any of the following: PM-10 - 0.12 lb/hr; SO_x (as SO₂) - 0.03 lb/hr; NO_x (as NO₂) - 0.97 lb/hr; CO - 2.84 lb/hr; or VOC - 0.05 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the primary dryer shall not exceed any of the following: PM-10 - 0.14 lb/hr; SO_x (as SO₂) - 0.03 lb/hr; NO_x (as NO₂) - 1.40 lb/hr; CO - 3.00 lb/hr; or VOC - 0.03 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
12. Compliance with fryer emission limit shall be demonstrated by District witnessed sample collection not less than once every two years. [District Rules 1081 and District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to demonstrate compliance with NO_x and CO emission limits of the baking oven and primary dryer shall be conducted within 60 days of startup, and not less than once every 12 months thereafter, except as provided below. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Source testing to demonstrate compliance with NO_x and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If permittee fails any compliance demonstration for NO_x and CO emission limits when testing not less than once every 36 months, compliance with NO_x and CO emission limits shall be demonstrated not less than once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, Particulates - EPA Method 5 (TSP) or EPA Method 201A (PM₁₀), Stack gas velocity - EPA Method 1, Stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and Stack gas moisture - EPA Method 4. [District Rule 1081 and District Rule 2201] Federally Enforceable Through Title V Permit
20. Stack gas volume of individual exhaust stacks shall be determined using EPA Reference Method 2. [District Rule 1081 and District Rule 2201] Federally Enforceable Through Title V Permit
21. Permittee shall maintain daily records of type and volume of fuel burned in the baking oven, and such records shall be available for District inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. Compliance with the conditions in the Title V permit shall be deemed compliance with the following requirements: Rule 1081, 4201, 4801. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
23. Permittee shall maintain copies of natural gas bills which shall be made available for District inspection upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. 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 & District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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