



OCT 23 2012

Matthew Frank
JR Simplot
PO Box 128
Helm, CA 93627

**Re: Notice of Minor Title V Permit Modification
District Facility # C-705
Project # C-1112913**

Dear Mr. Frank:

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 C-705-16-0 into the Title V operating permit. The ATC is for the installation of a 55 MMBtu/hr natural gas-fired boiler used as a temporary replacement emissions unit (TREU) for permit unit C-705-1-5.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-705-16-0, 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. Jim Swaney at (559) 230-5900.

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



OCT 23 2012

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 # C-705
Project # C-1112913

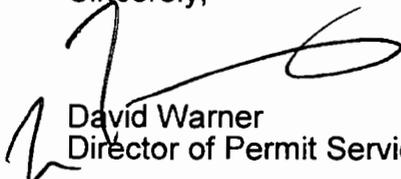
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. JR Simplot is proposing a Title V minor permit modification to incorporate the recently issued C-705-16-0 into the Title V operating permit. The ATC is for the installation of a 55 MMBtu/hr natural gas-fired boiler used as a temporary replacement emissions unit (TREU) for permit unit C-705-1-5.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-705-16-0, 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. Jim Swaney at (559) 230-5900.

Sincerely,


David Warner
Director of Permit Services

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

TITLE V APPLICATION REVIEW

Minor Modification
Project # C-1112913

Engineer. Thom Maslowski
Date: September 25, 2012

Facility Number: C-705
Facility Name: JR Simplot
Mailing Address: PO Box 128
Helm, CA 93627

Contact Name: Matthew Frank
Phone: (559)866-5681x14

Responsible Official: Matthew Frank
Title: Production Manager

I. PROPOSAL

JR Simplot is proposing a Title V minor permit modification to incorporate the recently issued C-705-16-0 into the Title V operating permit. For the installation of a 55 MMBtu/hr natural gas-fired boiler.

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

12688 S Colorado Ave
Helm, CA 93627

III. EQUIPMENT DESCRIPTION

C-705-16-0: 55 MMBTU/HR BABCOCK AND WILCOX MODEL FMO-66 NATURAL GAS-FIRED BOILER WITH TODD VARIFLAME LOW NOX BURNER, USED AS TEMPORARY REPLACEMENT EMISSIONS UNIT (TREU) FOR PERMIT UNIT C-705-1-5

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

ATC C-705-16-0 is a new permit unit; therefore, there is no existing Title V PTO that it will be modifying

Condition 1 of ATC C-705-16-0 has been removed as this application satisfies the requirements of the condition

All other ATC conditions will be carried over to the proposed PTO

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 No C-705-16-1
- B. Authority to Construct No C-705-16-0
- C Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
C-705-16-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-16-1

EXPIRATION DATE: 11/30/2014

EQUIPMENT DESCRIPTION:

55 MMBTU/HR BABCOCK AND WILCOX MODEL FMO-66 NATURAL GAS-FIRED BOILER WITH TODD VARIFLAME LOW NOX BURNER, USED AS TEMPORARY REPLACEMENT EMISSIONS UNIT (TREU) FOR PERMIT UNIT C-705-1-5

PERMIT UNIT REQUIREMENTS

1. This unit may be operated only while permit unit C-705-1 is shutdown for maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
2. This boiler shall be fired exclusively on PUC quality natural gas [District Rule 2201] Federally Enforceable Through Title V Permit
3. This unit must be removed from service within 180 days from the date of implementation of this Authority to Construct. The permittee shall maintain records indicating the days of operation of this boiler [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
4. NOx emissions shall not exceed 30 ppmv @ 3% O2 [District Rule 2201] Federally Enforceable Through Title V Permit
5. CO emissions shall not exceed 100 ppmv @ 3% O2 [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions shall not exceed any of the following limits. 0.0076 lb-PM10/MMBtu, 0.0006 lb-SOx/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The maximum combined heat input to the unit and unit C-705-1 shall not exceed 9 billion Btu per calendar year. [District Rules 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
8. Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 4305, 4306, 4320 and 4351 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
10. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. To demonstrate compliance with this requirement, the unit shall be fired on PUC-regulated natural gas or on natural gas with sulfur content not exceeding 4.2% by weight. [District Rule 4801 and County Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
11. If the unit is fired on PUC-regulated natural gas, then the operator shall maintain copies of fuel invoices and supplier certification of fuel sulfur content [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
12. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters) [District Rules 4306, 4320 and 4351] 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

- 13 If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year, this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown [District Rules 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
- 14 The permittee shall monitor, at least on a monthly basis, the operational characteristics recommended by the unit manufacturer, e.g. the amount of water use, the amount of unit blow down, the exhaust stack temperature, or other characteristics recommended by the unit manufacturer. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 day of restarting the unit unless monitoring has been performed within the last month [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
16. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit and unit C-705-1 for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either these units are permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320 [District Rule 4320]
- 17 {4253} Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request [District Rules 1070 and Rule 4320]
- 18 The permittee shall submit an analysis to the District showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above [District Rule 4320] Federally Enforceable Through Title V Permit
19. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. Records of monthly and annual heat input of the unit shall be maintained [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct No.
C-705-16-0



AUTHORITY TO CONSTRUCT

PERMIT NO: C-705-16-0

ISSUANCE DATE: 06/22/2010

LEGAL OWNER OR OPERATOR: J R SIMPLOT COMPANY

MAILING ADDRESS: PO BOX 128
HELM, CA 93627

LOCATION: 12688 S COLORADO AVE
HELM, CA 93627

EQUIPMENT DESCRIPTION:

55 MMBTU/HR BABCOCK AND WILCOX MODEL FMO-66 NATURAL GAS-FIRED BOILER WITH TODD VARIFLAME LOW NOX BURNER, USED AS TEMPORARY REPLACEMENT EMISSIONS UNIT (TREU) FOR PERMIT UNIT C-705-1-5

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 This unit may be operated only while permit unit C-705-1 is shutdown for maintenance or repair [District Rule 2201] Federally Enforceable Through Title V Permit
- 3 This unit must be removed from service within 180 days from the date of implementation of this Authority to Construct. The permittee shall maintain records indicating the days of operation of this boiler [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 4 This boiler shall be fired exclusively on PUC quality natural gas [District NSR Rule] Federally Enforceable Through Title V Permit
- 5 NOx emissions shall not exceed 30 ppmv @ 3% O2 [District NSR Rule] Federally Enforceable Through Title V Permit
- 6 CO emissions shall not exceed 100 ppmv @ 3% O2 [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions shall not exceed any of the following limits. 0.0076 lb-PM10/MMBtu, 0.0006 lb-SOx/MMBtu, or 0.0055 lb-VOC/MMBtu [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C 705-16-0 Jun 22 2010 1:35PM - MAS:CAVST Job Inspection NOT Required

8. The maximum combined heat input to the unit and unit C-705-1 shall not exceed 9 billion Btu per calendar year. [District Rules 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
9. Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units [District Rule 4305, 4306, 4320 and 4351 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
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11. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. To demonstrate compliance with this requirement, the unit shall be fired on PUC-regulated natural gas or on natural gas with sulfur content not exceeding 4.2% by weight [District Rule 4801 and County Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
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18. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request [District Rules 1070 and Rule 4320]
19. The permittee shall submit an analysis to the District showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above [District Rule 4320] Federally Enforceable Through Title V Permit
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22. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-705-16-0	324	5	68	657	45
TOTAL	324	5	68	657	45

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District RECEIVED

www.valleyair.org

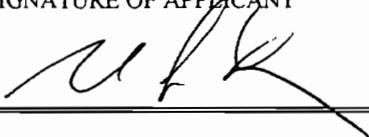
AUG 31 2011

Permit Application For:

Permits Services

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

SJVAPCD

1 PERMIT TO BE ISSUED TO JR SIMPLOT COMPANY	
2 MAILING ADDRESS	
STREET/P O BOX <u>12688 S Colorado Ave / PO Box 128</u>	
CITY <u>Helm</u> STATE <u>CA</u>	9-DIGIT ZIP CODE <u>93627-0128</u>
3 LOCATION WHERE THE EQUIPMENT WILL BE OPERATED	INSTALLATION DATE
STREET <u>12688 S Colorado Ave</u> CITY <u>Helm, CA</u>	July 28, 2010
¼ SECTION _____ TOWNSHIP _____ RANGE _____	REMOVED DECEMBER 9, 2010
4 GENERAL NATURE OF BUSINESS Fertilizer Production	
5 DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
ATC C-705-16-0. Temporary Boiler to replace C-705-1 during major maintenance activities. Boiler was installed, used for a few days, and removed immediately upon completion of repairs.	
6 TYPE OR PRINT NAME OF APPLICANT Matthew Frank	TITLE OF APPLICANT Production Manager
7 SIGNATURE OF APPLICANT 	DATE: <u>8/31/11</u>
	PHONE (559) 866-5681 x 14 FAX (559) 866-1507 EMAIL matthew.frank@simplot.co

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED \$ <u> </u> CHECK# _____
	DATE PAID _____
	PROJECT NO <u>C-1112913</u> FACILITY ID <u>C-705</u>

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

PROJECT # C-1112913

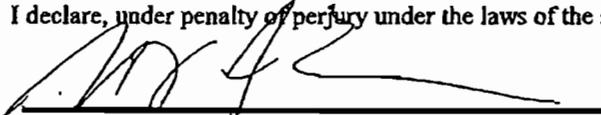
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: JR SIMPLOT COMPANY	FACILITY ID: C-705
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: JR SIMPLOT	
3. Agent to the Owner: MATT FRANK	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

10/27/2011

Date

MATTHEW FRANK

Name of Responsible Official (please print)

PRODUCTION MANAGER

Title of Responsible Official (please print)

San Joaquin Valley
Unified Air Pollution Control District

Certification of Truth and Accuracy

Company Name: J.R. SIMPLOT	Facility ID C - 705
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I declare, under penalty of perjury under the laws of the state of California that based on information and belief formed after reasonable inquiry, the statements and information provided in the document are true, accurate, and complete

MSF
Signature of Responsible Official

8/3/11
Date

Matthew S. Frank
Name of Responsible Official (please print)

Production Manager
Title of Responsible Official (please print)