



OCT 15 2012

Bryan Birrell
Frito-Lay Inc.
600 Garner Road
Modesto, CA 95357

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-1919
Project # N-1111412**

Dear Mr. Birrell:

Enclosed for your review and comment is the District's analysis of Frito-Lay's application for the Federally Mandated Operating Permit for its potato chip manufacturing facility located at 600 Garner Rd in Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

David Warner
Director of Permit Services

DW: JH/cp

Attachments



OCT 15 2012

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-1919
Project # N-1111412**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Frito-Lay's application for the Federally Mandated Operating Permit for its potato chip manufacturing facility located at 600 Garner Rd in Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

David Warner
Director of Permit Services

DW: JH/cp

Attachments



OCT 15 2012

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-1919
Project # N-1111412**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Frito-Lay's application for the Federally Mandated Operating Permit for its potato chip manufacturing facility located at 600 Garner Rd in Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

David Warner
Director of Permit Services

DW: JH/cp

Attachments

Modesto Bee

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
FEDERALLY MANDATED OPERATING PERMITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to Frito-Lay Inc. for its potato chip manufacturing facility located at 600 Garner Rd in Modesto, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1111412, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

Frito-Lay Inc.

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TITLE V APPLICATION REVIEW

Project #: N-1111412
Deemed Complete: May 25, 2011

Engineer: James Harader
Date: September 10, 2012

Facility Number: N-1919
Facility Name: Frito-Lay Inc
Mailing Address: 600 Garner Road
Modesto, CA 95357

Contact Name: Bryan Birrell
Phone: (209) 544-5411

Responsible Official: Bryan Birrell
Title: Regional Vice President

I. PROPOSAL

Frito-Lay Inc is proposing that an initial Title V permit be issued for its existing potato chip manufacturing facility in Modesto, CA. A Title V permit is required for this facility since the facility's NOx emissions exceed 20,000 lb/year.

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

II. FACILITY LOCATION

Frito-Lay Inc is located at 600 Garner Road in Modesto, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has requested to utilize model general umbrella template 0-3.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

As discussed above, the applicant has requested to utilize general umbrella template 0-3. Permit conditions associated with the use of umbrella template 0-3 are not subject to further EPA and public review.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

The applicant has proposed the use of general umbrella template 0-3. The following applicable requirements are addressed by general umbrella template 0-3.

District Rule 1100, Equipment Breakdown (Amended December 17, 1992)

District Rule 1160, Emission Statements (Adopted November 18, 1992)

District Rule 2010, Permits Required (Amended December 17, 1992)

District Rule 2020, Exemptions (Amended August 18, 2011)

District Rule 2031, Transfer of Permits (Amended December 17, 1992)

District Rule 2040, Applications (Amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (Amended December 17, 1992)

District Rule 2080, Conditional Approval (Amended December 17, 1992)

District Rule 2520, Federally Mandated Operating Permits (Amended June 21, 2001) Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16, and 10.0

District Rule 4101, Visible Emissions (Amended February 17, 2005)

District Rule 4601, Architectural Coatings (Amended December 17, 2009)

District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Construction, Demolition, Excavation, and Extraction Activities (Amended August 19, 2004)

District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Handling and Storage of Bulk Materials (Amended August 19, 2004)

District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Carryout and Trackout (Amended August 19, 2004)

District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Open Areas (Amended August 19, 2004)

District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Paved and Unpaved Roads (Amended August 19, 2004)

District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Unpaved Vehicle/Equipment Areas (Amended September 16, 2004)

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

40 CFR Part 82, Subpart B and F, Stratospheric Ozone

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1080, Stack Monitoring (Amended December 17, 1992)

District Rule 1081, Source Sampling (Amended December 16, 1993)

District Rule 2201, New and Modified Stationary Source Review Rule (Amended April 21, 2011)

District Rule 2520, Federally Mandated Operating Permits (Amended June 21, 2001) Sections not addressed by Umbrella Template

District Rule 4001, New Source Performance Standards (Amended April 14, 1999)

40 CFR Part 60 Subpart DC, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

District Rule 4002, National Emission Standards for Hazardous Air Pollutants (Amended May 20, 2004)

40 CFR 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources

District Rule 4201, Particulate Matter Concentration (Amended December 17, 1992)

District Rule 4202, Particulate Matter – Emission Rate (Amended December 17, 1992)

District Rule 4301, Fuel Burning Equipment (Amended 12/17/92)

District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2 (Amended August 21, 2003)

District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3 (Amended October 16, 2008)

District Rule 4309, Dryers, Dehydrators, and Ovens (Amended December 15, 2005)

District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (Amended October 16, 2008)

District Rule 4351, Boilers, Steam Generators, and Process Heaters – Phase 1 (Amended August 21, 2003)

District Rule 4801, Sulfur Compounds (Amended December 17, 1992)

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102, Nuisance (amended December 17, 1992)

For this facility, condition 41 of the facility wide permit N-1919-0-1 is based on the rule listed above and is not Federally Enforceable through Title V.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-3 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 40 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

District Rule 2201 - New and Modified Stationary Source Review Rule (District NSR Rule)

- a. LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 3.2 MMBTU/HR OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER

Permit unit N-1919-1 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through 11 from the existing PTO has been included as conditions #2 through #8, and #13 of the requirements for draft TV permit N-1919-1-7.
- b. LINE #4 (TORTILLA CHIP) CONSISTING OF TWO STEAM-HEATED PRE-COOKER, TWO 5.48 MMBTU/HR CASA HERRERA MODEL MACH IV XWXL OVENS (DIRECT-FIRED, INDUCED DRAFT), ONE STEAM-HEATED COOKER AND A MECHANICAL SEASONER

Permit unit N-1919-2 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #10 from the existing PTO have been included as conditions #2 through #7, and #9 of the requirements for draft TV permit N-1919-2-8.
- c. LINE #1 (POTATO CHIP) CONSISTING OF STEAM POWERED HEAT EXCHANGER SYSTEM PROVIDING HEAT TO A COOKER THAT IS SERVED BY AN OIL MIST ELIMINATOR, AND A MECHANICAL SEASONER

Permit unit N-1919-3 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #6 from the existing have been included as conditions #2, #3, and #5 of the requirements of draft TV permit N-1919-3-8.
- d. LINE #2 (LIGHT POTATO CHIP): ONE COOKER (WITH A STEAM-POWERED HEAT EXCHANGER) SERVED BY AN OIL MIST ELIMINATOR, TWO POST COOKER CONDITIONING UNITS (ONE HEATED BY STEAM, ONE HEATED BY PERMIT EXEMPT 0.5 MMBTU/HR DRYER DIRECT-FIRED BURNER) AND A MECHANICAL SEASONER

Permit unit N-1919-4 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #6 from the existing have been included as conditions #2, #3, and #5 of the requirements of draft TV permit N-1919-4-6.

e. CORN RECEIVING, STORAGE AND HANDLING SYSTEM SERVED BY CARTER DAY DUST COLLECTION SYSTEM

Permit unit N-1919-5 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #1 and #5 through #9 from the existing have been included as conditions #1, and #3 through #7 of the requirements of draft TV permit N-1919-5-2.

f. 50.5 MMBTU/HR NEBRASKA MODEL NS-C-58 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

Permit unit N-1919-6 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4, #5, #6, #7, #11, #12, #27, and #28 from the existing have been included as conditions #5, #7, #8, #9, #10, #11, #33, and #34 of the requirements of draft TV permit N-1919-6-9.

g. LINE #5 (SUN CHIP) CONSISTING OF A HAMMERMILL SERVED BY AN AAF TYPE-W ROTOCLONE EMISSIONS CONTROL SYSTEM, THREE HAMILTON MODEL SA300GAL PERMIT-EXEMPT PRE-COOKERS (STEAM HEATED), AND A HEAT & CONTROL MODEL E41 FRYER (STEAM HEATED) SERVED BY A HEAT AND CONTROL MODEL OME OIL MIST ELIMINATOR AND A SEASONER

Permit unit N-1919-7 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #11 from the existing have been included as conditions #2 through #8, and #12 of the requirements of draft TV permit N-1919-7-7.

- h. FRIED CHEESE PUFF LINE (LINE #7) CONSISTING OF PNEUMATIC CORN MEAL TRANSFER SYSTEM SERVED BY A SHICK TUBE-VEYOR CORPORATION MODEL STS-26 DUST COLLECTOR, TWO AMERICAN PROCESS MODEL DRB-18 BLENDERS, SIX R & D MACHINE MODEL FCP EXTRUDERS EACH SERVED BY A COMMON AMERICAN AIR FILTRATION W-TYPE ROTOCONE, ONE FRITO-LAY EQUIPMENT MODEL 77 CHAFF TUMBLER, ONE HEAT AND CONTROL STEAM-HEATED FRYER SERVED BY AN OIL MIST ELIMINATOR, ONE FRITO-LAY EQUIPMENT SEASONER, CONVEYORS AND PACKAGING EQUIPMENT

Permit unit N-1919-8 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #12 from the existing have been included as conditions #2 through #9, and #15 of the requirements of draft TV permit N-1919-8-6.

- i. ONE HOLT STEAM HEATED STARCH DRYER SERVED BY A MAC EQUIPMENT INC MODEL LST 120LAST64, STYLE III DUST COLLECTOR

Permit unit N-1919-11 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #9 from the existing have been included as conditions #2 through #7 of the requirements of draft TV permit N-1919-11-3.

- j. PNEUMATIC TRANSFER OF CORN MEAL FROM RAIL CARS TO TWO PEABODY/SHICK 5,130 CU FT STORAGE SILOS USING SHICK HIGH-VACUUM 58 HV24 DUST COLLECTOR (SERVING PNEUMATIC UNLOADING SYSTEM), AND A SHICK AUTOJET 58 AJ16 DUST COLLECTOR (SERVING THE STORAGE SILOS)

Permit unit N-1919-12 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #13 from the existing have been included as conditions #2 through #10 and #12 of the requirements of draft TV permit N-1919-12-2.

k. POTATO STARCH TRANSFER AND STORAGE OPERATION SERVED BY A REGENAIR MODEL R-6 PNEUMATIC BLOWER, A G.L. PRECISION MODEL 12PRF42-T PNEUMATIC RECEIVER/FILTER AND A 3,139 CU FT CAPACITY WHEATLAND MODEL 1415-60 STORAGE SILO

Permit unit N-1919-13 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #10 from the existing have been included as conditions #2 through #8 of the requirements of draft TV permit N-1919-13-3.

l. POTATO STARCH LOADOUT OPERATION SERVED BY A SMOOT MODEL 117-29-CA PNEUMATIC PUMP AND A G.L. PRECISION MODEL 60GLP16-T BAGHOUSE

Permit unit N-1919-14 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #10 from the existing have been included as conditions #2 through #8 of the requirements of draft TV permit N-1919-14-2.

m. 50.0 MMBTU/HR NEBRASKA MODEL NS-D-49 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

Permit unit N-1919-16 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4, #5, #6, #7, #11, #12, #27, and #28 from the existing have been included as conditions #5, #7, #8, #9, #10, #11, #33, and #34 of the requirements of draft TV permit N-1919-16-2.

District Rule 1080 - Stack Monitoring

This rule grants the APCO the authority to request the installation, use maintenance, and inspection of continuous monitoring equipment. The general, source and pollutant specific requirements for continuous monitoring equipment are defined. This rule also specifies the performance standards for the equipment and administrative recordkeeping, reporting, and violation and equipment breakdown notification requirements.

None of the units at this facility are required to install or operate a continuous emission monitoring system (CEMS) for District Rule purposes. Therefore, the requirements of District Rule 1080 are not applicable.

District Rule 1081 - Source Sampling

The purpose of this rule is to ensure that any source operation which emits or may emit air contaminants provides adequate and safe facilities for use in sampling to determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination. The facility is required to perform source testing for units N-1919-6 and N-1919-16. Compliance with District Rule 1081 for these units is demonstrated below.

a. Permit Unit N-1919-6

- Conditions #21 and #23 of the proposed TV permit will assure continued compliance with the requirements of District Rule 1081.

b. Permit Unit N-1919-16

- Conditions #21 and #23 of the proposed TV permit will assure continued compliance with the requirements of District Rule 1081.

District Rule 2520 - Federally Mandated Operating Permits

The requirements of Section 5.2, 9.0, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16, and 10.0 were addressed through the usage of Umbrella Template 0-3. The remaining District Rule 2520 requirements are addressed below.

Section 9.3 requires that periodic monitoring be performed if none is associated with a federally enforceable requirement.

a. Permit Unit N-1919-1

This unit includes a high-velocity air filter. The following Rule 2520 requirements were added as conditions #10 through #12 of draft TV permit N-1919-1-7.

- *The high velocity air filter system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520]*
- *The high velocity air filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520]*
- *Records of high velocity air filter system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520]*

b. Permit Unit N-1919-2

No additional rule 2520 conditions were required for this permit unit.

c. Permit Unit N-1919-3

No additional rule 2520 conditions were required for this permit unit.

d. Permit Unit N-1919-4

No additional rule 2520 conditions were required for this permit unit.

e. Permit Unit N-1919-5

This unit includes a dust collection system. Additionally, the dust collection system is required to have no visible emissions. The following Rule 2520 requirements were added as conditions #9 through #12 of draft TV permit N-1919-5-2.

- *Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520]*
- *The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520]*
- *The dust collection system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520]*
- *Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520]*

f. Permit Unit N-1919-6

No additional rule 2520 conditions were required for this permit unit.

g. Permit Unit N-1919-7

This unit includes a mist eliminator. Additionally, the current permit requires no visible emissions from the exhaust of the oil mist eliminator, except for uncombined water vapor. The following Rule 2520 requirements were added as conditions #10 and #11 of draft TV permit N-1919-7-7.

- *Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520]*
- *Records of oil mist eliminator maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520]*

h. Permit Unit N-1919-8

This permit includes a dust collection system. Additionally, visible emissions are limited to 5% opacity. The following Rule 2520 requirements were added as conditions #11 through #14 of draft TV permit N-1919-8-6.

- *Visible emissions from the dust collector shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520]*
- *The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520]*
- *The dust collection system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520]*
- *Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520]*

i. Permit Unit N-1919-11

This permit includes a dust collection system. The following Rule 2520 requirements were added as conditions #10 through #12 of draft TV permit N-1919-11-3.

- *The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520]*
- *The dust collection system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520]*
- *Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520]*

j. Permit Unit N-1919-12

This condition includes a baghouse; however, the baghouse already includes differential pressure gauge monitoring requirements. No additional rule 2520 conditions were required for this permit unit.

k. Permit Unit N-1919-13

This permit includes a receiver/filter system. Additionally, visible emissions are limited by the current permit to no more than 5% opacity. The following Rule 2520 requirements were added as conditions #10 through #13 of draft TV permit N-1919-13-3.

- *Visible emissions from the receiver filter shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520]*
- *The receiver/filter shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520]*
- *The receiver/filter system system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520]*
- *Records of receiver/filter system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520]*

l. Permit Unit N-1919-14

This permit includes a baghouse. Additionally, visible emissions are limited by the current permit to no more than 5% opacity. The following Rule 2520 requirements were added as conditions #10 through #13 of draft TV permit N-1919-14-2.

- *Visible emissions from the baghouse shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520]*

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 N-1111412

- *The baghouse shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520]*
- *The baghouse shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520]*
- *Records of baghouse system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520]*

m. Permit Unit N-1919-16

No additional rule 2520 conditions were required for this permit unit.

District Rule 4001 - New Source Performance Standards

District Rule 4001 requires incorporates the provisions of 40 CFR Part 60. Compliance with the subparts of 40 CFR Part 60 is demonstrated as follows.

40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

The following tables demonstrate how the proposed TV permit complies with Subpart Dc requirements.

40 CFR 60 – Subpart.DC Requirements	Method of Compliance
Section 60.40c(a) states that an affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (100 MMBtu/hr) or less, but greater than 2.9 MW (10 MMBtu/hr).	This facility includes two units that are subject to the requirements of 40 CFR 60 Subpart DC, boilers N-1919-6 and N-1919-16.
60.42c – Standard for Sulfur Dioxide (SO₂)	
Section 60.42c(a) lists the emission standard for sulfur dioxide (SO ₂) for affected units that combust only coal.	Neither boiler is fired on coal. Therefore, the standards of this section are not applicable.
Section 60.42c(b) lists the emission standard for sulfur dioxide (SO ₂) for affected units that combust only coal refuse alone in a fluidized bed combustion steam generator, or combusts only coal and uses an emerging technology for control of SO ₂ emissions.	Neither boiler is fired on coal or coal refuse. Therefore, the standards of this section are not applicable.
Section 60.42c(c) lists the emission standard for sulfur dioxide (SO ₂) for affected units that combust coal, alone or in combination with any other fuel	Neither boiler is fired on coal. Therefore, the standards of this section are not applicable.
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40 CFR 60 – Subpart DC Requirements	Method of Compliance
Section 60.42c(d) lists the emission standard for sulfur dioxide (SO ₂) for affected units that combust oil.	Neither boiler is fired on oil. Therefore, the standards of this section are not applicable.
Section 60.42c(e) lists the emission standard for sulfur dioxide (SO ₂) for affected units that combust coal, oil, or coal and oil with any other fuel.	Neither boiler is fired on coal or oil. Therefore, the standards of this section are not applicable.
Section 60.42c(f) states that the reduction in potential SO ₂ emission rate through fuel treatment is not credited toward the percent reduction in (b)(2) of Section 60.42c.	Neither boiler is subject to any SO ₂ standards in 60.42c. Therefore, this requirement is not applicable.
Section 60.42c(g) states, except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits must be determined on a 30-day rolling basis.	Neither boiler is subject to any SO ₂ standards in 60.42c. Therefore, this requirement is not applicable.
Section 60.42c(h) allows compliance with the emission limits or fuel oil sulfur limits to be determined based on certification from the fuel supplier.	Neither boiler is subject to any SO ₂ standards in 60.42c. Therefore, this requirement is not applicable.
Section 60.42c(i) states that the SO ₂ emission limits, fuel oil sulfur limits, and percent reduction requirements of this Section apply at all times, including start-up, shutdown, and malfunction.	Neither boiler is subject to any SO ₂ standards in 60.42c. Therefore, this requirement is not applicable.
Section 60.42c(j) states that for facilities located in the noncontinental areas and affected facilities complying with the percent reduction standard, only the heat input supplied to the affected unit from the combustion of coal and oil is counted under this section.	Neither boiler is subject to any SO ₂ standards in 60.42c. Therefore, this requirement is not applicable.
60.43c – Standard for Particulate Matter (PM)	
Section 60.43c(a) lists the emission standards for particulate matter for affected units that combust coal or combusts mixtures of coal with other fuels, commences construction, modification, or reconstruction on or before February 28, 2005, and has a heat input capacity of 30 MMbtu/hr or greater.	Neither boiler is fired on coal. Therefore, the standards of this section are not applicable.
Section 60.43c(b) lists the emission standards for particulate matter for affected units that combust wood or combusts mixtures of wood with other fuels, commences construction, modification, or reconstruction on or before February 28, 2005, and has a heat input capacity of 30 MMbtu/hr or greater.	Neither boiler is fired on wood. Therefore, the standards of this section are not applicable.
Section 60.43c(c) lists the emission standards for particulate matter for affected units that combust coal, wood, or oil, and has a heat input capacity of 30 MMbtu/hr or greater.	Neither boiler is fired on coal, wood, or oil. Therefore, the standards of this section are not applicable.
Section 60.43c(d) states that the PM and opacity standards of this section applies at all times, except during periods of start-up, shutdown, or malfunction.	Neither boiler is subject to any PM or opacity standards in 60.43c. Therefore, this requirement is not applicable.
Section 60.43c(e)(1) lists the emission standard for particulate matter for affected units that combust coal or combusts mixtures of coal, oil, wood, a mixture of these fuels, or a mixtures of these fuels with any other fuels, commences construction, modification, or reconstruction after February 28, 2005, and has a heat input capacity of 30 MMbtu/hr or greater.	Neither boiler is fired on coal, oil, or wood. Therefore, the standards of this section are not applicable.
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40 CFR 60 – Subpart DC Requirements	Method of Compliance
60.44c – Compliance and Performance Test Methods and Procedures for Sulfur Dioxide	
Section 60.44c(a) states that performance tests required under Section 60.8 must be conducted following the procedures specified in paragraph's (b), (c), (d), (e), and (f) of this Section, as applicable.	Both boilers were determined to not be subject to any emission standards or percent reduction requirements under Section 60.42c, and is not fired on coal or oil. Thus, Section 60.44c testing requirements are not applicable to these boilers.
Section 60.44c(b) states that the initial performance test required under Section 60.8 must be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the percent reduction requirements and SO ₂ emission limits under 60.42c must be determined using a 30-day average.	
Section 60.44c(c) states that after the initial performance test is conducted, compliance with the percent reduction requirements and SO ₂ emission limits under Section 60.42c is based on the average percent reduction and the average SO ₂ emission rates for 30 consecutive steam generating unit operating days.	
Section 60.44c(d) lists SO ₂ testing requirements for affected facilities that combust only coal, oil, or a mixture of oil and coal.	
Section 60.44c(e) lists SO ₂ testing requirements for affected facilities that combust coal, oil, or coal and oil with other fuels.	
Section 60.44c(f) lists SO ₂ testing requirements for facilities that are subject to percent reduction requirements under Section 60.42c.	
Section 60.44c(g) lists SO ₂ testing requirements for facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under 60.42c based on shipment fuel sampling.	
Section 60.44c(h) lists SO ₂ testing requirements for affected facilities subject to 60.42c(h)(1), (2), or (3).	
Section 60.44c(i) lists SO ₂ testing requirements for affected facilities seeking to demonstrate compliance with the SO ₂ standards under Section 60.42c(c)(2).	
Section 60.44c(j) states that the operator must use valid SO ₂ emission data in performing the necessary calculations for Sections (d), (e), or (f) of this section.	
60.45c – Compliance and Performance Test Methods and Procedures for Particulate Matter	
Section 60.45c(a) states that an owner or operator of an affected facility subject to the PM and/or opacity standards of 60.43c must conduct an initial performance test as required under Section 60.8 and lists further testing requirements.	Both boilers were determined to not be subject to any of the emission standards or opacity requirements listed under Section 60.43c of this subpart. Thus, the Section 60.45c testing requirements are not applicable to these boilers.
Section 60.45c(b) lists PM testing requirements for the owner or operator of an affected facility seeking to demonstrate compliance with Section 60.43c(b)(2).	
Section 60.45c(c) states that in place of PM testing with Method 5 or Method 5B of this part, or Method 17 of this part, an owner or operator may elect to install, calibrate, and operate a CEMS for monitoring PM emissions.	
Section 60.45c(d) lists PM testing requirements for facilities seeking to demonstrate compliance under 60.43c(e)(4).	
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40 CFR 60 – Subpart DC Requirements	Method of Compliance
60.46c – Emission Monitoring for Sulfur Dioxide	
Section 60.46c(a) states, except as provided in paragraphs (d) and (e) of this Section, an affected facility subject to the SO ₂ emission limits under 60.42c must install, calibrate, maintain, and operate a CEMS for measuring SO ₂ concentrations.	The emission requirements of Section 60.42c were determined to not apply to the boilers at this facility. Therefore, a CEMs is not required and alternative monitoring need not be elected. None of the requirements of Section 60.46c are applicable to these boilers.
Section 60.46c(b) states that the CEMS must measure the 1-hou average SO ₂ emission rates and be expressed in lb/MMBtu heat input or ng/J units.	
Section 60.46c(c) states that the procedures in Section 60.13 must be followed for the installation, evaluation, and operation of the CEMS.	
Section 60.46c(d) states that as an alternative to operating a CEMS at the inlet to the SO ₂ control device (or outlet if no SO ₂ control device is used), an owner or operator may elect to determine the SO ₂ emission rate by sampling fuel prior to combustion.	
Section 60.46c(e) states that the monitoring requirements of paragraphs (a) through (d) of this section do not apply to units subject to Section 60.42c(h)(1), (2), or (3).	
Section 60.46c(f) states that the owner or operator of an affected facility operating a CEMS pursuant to paragraph (a) of this section , or conducted as-fired fuel sampling pursuant to paragraph (d)(1) of this section, must obtain emission data for at least 75% of the operating hours in at least 22 out of 30 successive steam generating unit operating days.	
60.47c – Emission Monitoring for Particulate Matter	
Section 60.47c(a) states, except as provided in paragraphs (c), (d), (e), (f), and (g) of this section, the owner or operator of an affected facility combusting coal, oil, or wood that is subject to the opacity standards under Section 60.43c must install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS).	These boilers are not subject to any of the emission and opacity requirements of Section 60.42c and the boilers are not fired on coal, oil, or wood. Therefore, a COMs is not required, a CEMS is not required, and alternative monitoring methods need not be elected. None of the requirements of Section 60.47c are applicable to these boilers.
Section 60.47c(b) states that all COMS must be operate in accordance with Performance Specification 1 of Appendix B of this Part.	
Section 60.47c(c) states that owners of an affected facility that burns only distillate oil that contains no more than 0.5% by weight sulfur, and/or gaseous fuels with potential sulfur dioxide emission rates of 26 ng/J (0.060 lb/MMBtu) heat input or less and that do not use post-combust technology are not required to install a COMs if they follow the applicable procedures of 60.48c(f).	
Section 60.47c(d) states that owners or operators complying with the PM emission limit by using a PM CEMS must calibrate, maintain, operate, and record the output of the PM emissions discharged to the atmosphere as specified in Section 60.45c(c).	
Section 60.47c(e) states that owners and operators of an affected facility that is subject to an opacity standard in Section 60.43c(c) and that does not use post combustion technology (except for a wet scrubber) for reducing PM, SO ₂ , or CO emissions, burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur, and is operated such that emissions of CO are less than 0.15 lb/MMbtu is not required to install a COMs.	
Section 60.47c(f) states that owners and operators of an affected facility that is subject to an opacity standard in 60.43c(c) and that uses a bag leak detection system to monitor performance of the fabric filter is not required to install a COMS.	
Section 60.47c(g) states that owners and operators of an affected facility that is subject to an opacity standard in Section 60.43c(c) and that only burns gaseous fuels or oils that contain less than 0.5% by weight percent sulfur and operates according to a written site-specific monitoring plan approved by the permitting authority is not required to operate a COMS.	
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40 CFR 60 – Subpart DC Requirements	Method of Compliance
60.48c – Reporting and Recordkeeping Requirements	
Section 60.48c(a) states that the owner or operator of each affected facility must submit notification of the date of construction or reconstruction and actual startup.	This requirement was satisfied upon the initial startup of each boiler. A permit condition is not required.
Section 60.48c(b) requires the owner or operator of each affected facility that is subject to the SO ₂ requirements of Section 60.42c to submit the performance test results to the administrator.	Neither boiler is subject to the SO ₂ requirements of Section 60.42c; therefore, this requirement is not applicable.
Section 60.48c(c) states that the owner or operator of an affected facility subject to the opacity limits in 60.43c(c) must submit excess emission reports for the unit.	Neither boiler is subject to the opacity limits in Section 60.43c(c); therefore, this requirement is not applicable.
Section 60.48c(d) requires the owner or operator of each affected facility subject to the SO ₂ emission limits, fuel oil sulfur limits, or percent reduction requirements of Section 60.42c to submit reports to the administrator.	Neither boiler is subject to the SO ₂ emission limits, fuel oil sulfur limits, and the percent reduction requirements of Section 60.42(c); therefore, this requirement is not applicable.
Section 60.48c(e) specifies the records that must be kept and included in the reports submitted for units subject to the reporting requirement in Section 60.48c(d).	Neither boiler is subject to the reporting requirement of Section 60.48c(d); therefore, the requirements of Section 60.48c(e) do not apply.
60.48c(f) lists the requirements for facilities that are required to supply fuel certification information.	Neither boiler is required to supply fuel certification information; therefore, the requirements of Section 60.48c(f) are not applicable.
Except as provided in paragraphs 60.48c(g)(2) or g(3) of this Section, Section 60.48c(g)(1) requires the owner or operator of an affected facility to keep daily records of the quantity of each type of fuel consumed. However, section 60.48c(g)(2) allows units fired on natural gas and LPG to keep monthly records of fuel usage for each fuel rather than daily records.	<p><u>N-1919-6 and N-1919-16</u></p> <p>This recordkeeping requirement is included as condition #34 on each of the proposed boiler TV permits.</p>
Section 60.48c(h) requires the owner and operator of each affected facility that is subject to an annual capacity factor to calculate the annual capacity factor individually for each fuel combusted.	Neither boiler is subject to an annual capacity factor requirement; therefore, the requirements of Section 60.48c(h) are not applicable.
Section 60.48c(i) states that all records required under this section must be maintained by the owner or operator for a minimum period of two years.	<p><u>N-1919-6 and N-1919-16</u></p> <p>This recordkeeping requirement is included as condition #35 on each of the proposed boiler TV permits.</p>
Section 60.48c(j) states that the reporting period for reports required under this subpart is each six-month period.	Neither boiler is subject to any of the reporting requirements of this Subpart. Therefore, this requirement is not applicable.

District Rule 4002 - National Emission Standards for Hazardous Air Pollutants (NESHAP's)

This rule incorporates NESHAPs from 40 CFR Part 61 and the NESHAPs from 40 CFR Part 63. The following subparts may apply to units operated at this facility.

40 CFR 63 - Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

Section 63.7485 states that Subpart DDDDD is applicable to owners and operators of an industrial, commercial, or institutional boiler or process heater that is located at, or is part of, a major source of Hazardous Air Pollutant (HAP) emissions. Thus, this rule may apply to boilers N-1919-6 and N-1919-16. Pursuant to calculations in Appendix D of this evaluation, this facility is not a Major Source of HAP emissions. Therefore, 40 CFR 63 Subpart DDDDD requirements are not applicable.

40 CFR 63 - Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters Area Sources

Section 63.11195(e) states that gas-fired boilers are not subject to the requirements of this Subpart. Both of the boilers at this facility, N-1919-6 and N-1919-16, are fired exclusively on natural gas and LPG/propane. These fuels are each considered to be gaseous fuels. Therefore, the requirements of this Subpart are not applicable.

District Rule 4201 - Particulate Matter Concentration

Section 3.1 of District Rule 4201 requires emissions to be at or below 0.1 grains of particulate matter per dry standard cubic foot of exhaust gas. This requirement applies to all of the permit units operated by this facility.

a. Permit Units N-1919-1-7, N-1919-2-8, N-1919-3-8, N-1919-4-6, N-1919-6-9, N-1919-7-7, N-1919-8-6, N-1919-11-13, N-1919-12-2, N-1919-13-3, N-1919-14-2, and N-1919-16-2

- Condition #1 of each of the proposed TV permits listed above will assure continued compliance.

b. Permit Unit N-1919-5-2

- Condition #2 of of the proposed TV permit listed above will assure continued compliance.

District Rule 4202 - Particulate Matter Emission Rate

Per Sec. 4.1, the particulate matter emissions from any source operation shall not exceed the allowable hourly emission rate (E) as calculated using the following formulas:

$$E \text{ (lb/hr)} = 3.59 P^{0.62} \text{ for process rates (P) < 30 tons/hr}$$

$$E \text{ (lb/hr)} = 17.31 P^{0.16} \text{ for process rates (P) > 30 tons/hr}$$

The following table demonstrates how Rule 4202 will be enforced for each of the permit units:

Draft TV Permit	Condition Requiring Rule 4202 Compliance
N-1919-1-7	#9
N-1919-2-8	#8
N-1919-3-8	#4
N-1919-4-6	#4
N-1919-5-2	#8
N-1919-6-9	N/A, no process throughput
N-1919-7-7	#9
N-1919-8-6	#10
N-1919-11-3	#9
N-1919-12-2	#11
N-1919-13-3	#9
N-1919-14-2	#9
N-1919-16-2	N/A, no process throughput

District Rule 4301 - Fuel Burning Equipment

The boilers, N-1919-6 and N-1919-16, are the only emission units that are Subject to District Rule 4301 requirements. District Rule 4301 requires the following:

1. The emission concentration of combustion contaminants must not exceed 0.1 grain per cubic foot of gas, calculated to 12% of carbon dioxide at standard conditions.
2. Emissions must not exceed 200 pounds per hour of sulfur compounds (calculated as sulfur dioxide), 140 pounds of nitrogen oxides (calculated as nitrogen dioxide) and 10 pounds of combustion contaminants (PM).

N-1919-6 and N-1919-16

Conditions #1 through #3 of proposed TV permits N-1919-6-9 and N-1919-16-2 enforce the requirements of District Rule 4301.

District Rule 4305 – Boilers, Steam Generators, and Process Heaters - Phase 2

The following tables demonstrate how the proposed TV permit will ensure compliance with District Rule 4305.

Rule 4305 Requirements	Method of Compliance
Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler with a rated heat input greater than 5 MMBtu/hr.	The two boilers at this facility, N-1919-6 and N-1919-16, are gaseous fired units that are rated at 50.5 MMBtu/hr and 50 MMBtu/hr respectively. Therefore, District Rule 4305 requirements are applicable to each of these units.
Section 4.2 states that the requirements of Section 5.1 and 5.3 do not apply when burning a fuel other than PUC quality natural gas during natural gas curtailment provided fuels other than natural gas are burned no more than 336 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing.	<u>N-1919-6 and N-1919-16</u> Each of these boilers is permitted to fire on LPG/Propane backup during natural gas curtailment. Condition #9 of each proposed TV permit enforces the hour restriction on the backup fuel.
Section 5.1 states that for all unit, except for box and cabin type units and vertical cylindrical process heaters, the NOx emissions must not exceed 30 ppmv at 3% O ₂ or 0.036 lb/MMBtu, when fired on gaseous fuel.	<u>N-1919-6 and N-1919-16</u> Condition #10 of each proposed TV permit enforces this requirement by limiting each boiler to 7 ppmvd NOx @ 3% O ₂ when fired on the primary fuel.
Section 5.2 states requirements for units that are limited to a heat input of less than 30 billion Btu/year.	Neither of the two boilers is limited to less than 30 billion Btu/year. Therefore, the requirements of Section 5.2 are not applicable.
Section 5.3 limits CO emissions to 400 ppmv @ 3% O ₂ .	<u>N-1919-6 and N-1919-16</u> Condition #10 of each proposed TV permit enforces this requirement by limiting each boiler to 100 ppmvd CO @ 3% O ₂ when fired on the primary fuel.
Section 5.4.1 states that any unit that simultaneously fires on gaseous and liquid fuels must be equipped with an operational, non-resettable totalizing mass or volumetric flow meter in each fuel line to the unit.	Each of the boilers is fired solely on gaseous fuel. Therefore, this requirement is not applicable.
Section 5.4.2 states that a unit subject to the emission limits in 5.1, 5.2.3, or 5.3 must be equipped with either an operational APCO approved Continuous Emissions Monitoring System for NOx, CO and Oxygen, or be equipped with an APCO-approved alternate monitoring system.	<u>N-1919-6 and N-1919-16</u> Each boiler is equipped with an APCO-approved alternate monitoring system. Conditions #24 through #27 of each proposed TV permit enforce this requirement.
Section 5.4.3 states that for units subject to the requirements of Section 5.2.1 or 5.2.2, the operator must monitor the operational characteristics recommended by the manufacturer and approved by the APCO.	Neither boiler is subject to the requirements of Sections 5.2.1 or 5.2.2; therefore, the requirements of Section 5.4.3 are not applicable.
Section 5.4.4 states that any unit subject to Section 5.2.1 or 5.2.2 must be equipped with an operational, non-resettable totalizing mass or volumetric flow meter in each fuel line to the unit.	Neither boiler is subject to the requirements of Sections 5.2.1 or 5.2.2; therefore, the requirements of Section 5.4.4 are not applicable.

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Rule 4305 Requirements	Method of Compliance
Section 5.5.1 states that an operator of any unit has the option of complying with either the heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1.	<u>N-1919-6 and N-1919-16</u> Condition #22 of the each proposed TV permit enforces this requirement.
Section 5.5.2 states that all emissions measurements must be made with the unit operating at either conditions representative of normal operations or conditions specified in the Permit to Operate.	<u>N-1919-6 and N-1919-16</u> Condition #19 of each proposed TV permit enforces this requirement.
Section 5.5.3 states that all continuous emission monitoring system (CEMS) measurements must be averaged over a period of 15 consecutive minutes.	Neither boiler is equipped with a CEMS; therefore, this requirement is not applicable.
Section 5.5.4 states that for emissions monitoring pursuant to 5.4.2, 5.4.2.1, and 6.3.1 using a portable NOx analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings must be averaged over a 15 minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings evenly spaced out over the 15-consecutive minute period.	<u>N-1919-6 and N-1919-16</u> Condition #26 of each proposed TV permit enforces this requirement.
Section 5.5.5 states that for emission source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard of this Rule, the arithmetic average of three 30-minute consecutive-minute test runs shall apply. If two of the three runs are above an applicable limit, the test cannot be used to determine compliance with an applicable limit.	<u>N-1919-6 and N-1919-16</u> Condition #20 of the each proposed TV permit enforces this requirement.
Section 5.5.6 lists startup and shutdown requirements.	The permit for each boiler does not include any relief from the permitted emission limits during startup and shutdown periods. Therefore, the startup and shutdown requirements are not applicable.
Section 5.6 lists requirements for the operator of any functionally identical replacement for a box or cabin type unit.	This facility is not operating any functionally identical replacement units. Therefore, this requirement is not applicable.
Section 6.1 states that the records required by Sections 6.1.1 through 6.1.5 must be maintained for five calendar years and be made available to the APCO upon request.	<u>N-1919-6 and N-1919-16</u> Condition #35 of each proposed TV permit enforces this requirement.
Section 6.1.1 lists recordkeeping requirements for any unit operated under the exemption of Section 4.2 of the Rule (use of other fuels during curtailment periods).	<u>N-1919-6 and N-1919-16</u> Each boiler is permitted to use backup fuels during natural gas curtailment periods. Condition #33 of each proposed TV permit enforces this recordkeeping requirement.
Section 6.1.2 lists recordkeeping requirements for any unit operated under the exemption of Section 4.3 of the Rule.	This facility does not operate any units that were exempted under Section 4.3 of the Rule. Therefore, the requirements of Section 6.1.2 are not applicable.
Section 6.1.3 lists recordkeeping requirements for any unit subject to Sections 5.2.1 or 5.2.2 of the Rule.	This facility does not operate any units that are subject to either Sections 5.2.1 or 5.2.2 of the Rule. Therefore, the requirements of Section 6.1.3 are not applicable.

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Rule 4305 Requirements	Method of Compliance
Section 6.1.4 lists recordkeeping requirements for units that are required to either be tuned up or for units where monthly operational characteristics must be monitored.	The boilers at this facility are not required to be tuned up and monthly operational characteristics are not required to be monitored. Therefore, the recordkeeping requirements of Section 6.1.4 are not applicable.
Section 6.1.5 requires the operator of any unit performing start-up or shutdown pursuant to Section 5.5.6 to keep records of the duration of the start-up or shutdown.	The boilers at this facility are not subject to Section 5.5.6 requirements. Therefore, this requirement is not applicable.
Section 6.2.2 states that the oxides of nitrogen (ppmv) must be determined using EPA Method 7E or ARB Method 100.	<u>N-1919-6 and N-1919-16</u> Condition #13 of each proposed TV permit enforces this requirement.
Section 6.2.3 states that carbon monoxide (ppmv) must be determined using EPA Method 10 or ARB Method 100.	<u>1919-6 and N-1919-16</u> Condition #14 of each proposed TV permit enforces this requirement
Section 6.2.4 requires stack gas oxygen be determined using EPA Method 3 or 3A, or ARB Method 100.	<u>N-1919-6 and N-1919-16</u> Condition #15 of each proposed TV permit enforces this requirement
Section 6.2.5 requires the NOx emission (lb/MMBtu) be determined using EPA Method 19.	<u>1919-6 and N-1919-16</u> Condition #13 of each proposed TV permit enforces this requirement
Section 6.2.6 requires the stack gas velocity be determined using EPA Method 2.	<u>1919-6 and N-1919-16</u> Condition #17 of each proposed TV permit enforces this requirement
Section 6.2.7 requires the stack gas moisture content be determined using EPA Method 4.	<u>1919-6 and N-1919-16</u> Condition #18 of each proposed TV permit enforces this requirement
Section 6.3.1 requires each unit be source tested to determine compliance at least once every 12 months. For gaseous fired units demonstrating compliance on two consecutive 12-month tests, the next test may be deferred for up to 36 months. During the 36 month source test interval, the operator must tune the unit in accordance, unless monitoring with a CEMS or APCO approved monitoring system where the applicable emission limits are periodically monitored.	<u>N-1919-6 and N-1919-16</u> The facility uses a portable analyzer to measure emissions monthly, thus tuning is not required. Condition #12 of each proposed TV permit enforces this requirement
Sections 6.4, 7.0, and 8.0 list emission control plan, compliance schedule, and calculation requirements.	These requirements have all been satisfied and will not be included on the TV permit.

District Rule 4306 – Boilers, Steam Generators, and Process Heaters – Phase 3

The following tables demonstrate how the proposed TV permit will ensure compliance with District Rule 4306.

Rule 4306 Requirements	Method of Compliance
Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler, process heater, or steam generator with a total rated heat input greater than 5 million Btu per hour.	The two boilers at this facility, N-1919-6 and N-1919-16, are gaseous fired units that are rated at 50.5 MMBtu/hr and 50 MMBtu/hr respectively. Therefore, District Rule 4306 requirements are applicable to each of these units.
Section 4.2 states that the requirements of Section 5.1 and 5.3 do not apply when burning a fuel other than PUC quality natural gas during natural gas curtailment provided: 1) fuels other than natural gas are burned no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing, and 2) NOx emissions do not exceed 150 ppmv or 0.215 lb/MMBtu.	<u>N-1919-6 and N-1919-16</u> Each of these boilers is permitted to fire on LPG/Propane backup during natural gas curtailment. Conditions #9, #28, and #29 of each proposed TV permit enforces the hour restrictions and testing requirements for the backup fuel.
Section 5.1.1, Table 1, Category B states the following emission limits for all units with a rated heat input greater than 20 MMBtu/hr, except units subject to Categories C, D, E, F, G, H, or I. NOx: 9 ppmv @ 3% O ₂ or 0.018 lb/MMBtu CO: 400 ppmv @ 3% O ₂	<u>N-1919-6 and N-1919-16</u> Condition #10 of each proposed TV permit enforces this requirement by limiting each boiler to 7 ppmvd NOx @ 3% O ₂ and 100 ppmvd CO @ 3% O ₂ when fired on the primary fuel.
Section 5.1.2 provides an equation for determining the NOx emission limit for units fired on combinations of gas and liquid fuel.	Neither boiler is fired on liquid fuel. Therefore, this requirement is not applicable.
Section 5.2 lists requirements for units limited to less than 9 billion Btu per calendar year.	Neither boiler is limited to 9 billion Btu per calendar year. Therefore, the requirements of Section 5.2 are not applicable.
Section 5.3 lists startup and shutdown requirements.	The permit for each boiler does not include any relief from the permitted emission limits during startup and shutdown periods. Therefore, the startup and shutdown requirements are not applicable.
Section 5.4.1 states that any unit that simultaneously fires on gaseous and liquid fuels must be equipped with an operational, non-resettable totalizing mass or volumetric flow meter in each fuel line to the unit.	Each boiler is fired solely on gaseous fuel. Therefore, this requirement is not applicable.
Section 5.4.2 states that a unit subject to the emission limits in 5.1, 5.2.3, or 5.3 must be equipped with either an operational APCO approved Continuous Emissions Monitoring System for NOx, CO and Oxygen, or be equipped with an APCO-approved alternate monitoring system.	<u>N-1919-6 and N-1919-16</u> Each boiler is equipped with an APCO-approved alternate monitoring system. Conditions #24 through #27 of each proposed TV permit enforce this requirement.
Section 5.4.3 states that for units subject to the requirements of Section 5.2.1 or 5.2.2, the operator must monitor the operational characteristics recommended by the manufacturer and approved by the APCO.	Neither boiler is subject to the requirements of Sections 5.2.1 or 5.2.2; therefore, the requirements of Section 5.4.3 are not applicable.
Section 5.4.4 states that any unit that is a Category H unit (limited between 9 and 30 billion Btu/year) or subject to Section 5.2.1 or 5.2.2 must be equipped with an operational, non-resettable totalizing mass or volumetric flow meter in each fuel line to the unit.	Neither boiler is subject to the requirements of Sections 5.2.1 or 5.2.2; therefore, the requirements of Section 5.4.4 are not applicable.
Section 5.4.5 states that the APCO must not approve an alternative monitoring system unless it is documented that continued operation within the ranges of specified emissions-related performance indicators or operations characteristics provides a reasonable assurance of compliance with the applicable emission limits.	The approved APCO monitoring system measures emissions directly, using a portable analyzer. This condition is satisfied.
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Rule 4306 Requirements	Method of Compliance
Section 5.5.1 states that an operator of any unit has the option of complying with either the heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1.	<u>N-1919-6 and N-1919-16</u> Condition #22 of the each proposed TV permit enforces this requirement.
Section 5.5.2 states that all emissions measurements must be made with the unit operating at either conditions representative of normal operations or conditions specified in the Permit to Operate.	<u>N-1919-6 and N-1919-16</u> Condition #19 of each proposed TV permit enforces this requirement.
Section 5.5.3 states that all continuous emission monitoring system (CEMS) measurements must be averaged over a period of 15 consecutive minutes.	Neither boiler is equipped with a CEMS; therefore, this requirement is not applicable.
Section 5.5.4 states that for emissions monitoring pursuant to 5.4.2, 5.4.2.1, and 6.3.1 using a portable NOx analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings must be averaged over a 15 minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15-consecutive minute period.	<u>N-1919-6 and N-1919-16</u> Condition #26 of each proposed TV permit enforces this requirement.
Section 5.5.5 states that for emission source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard of this Rule, the arithmetic average of three 30-minute consecutive-minute test runs shall apply. If two of the three runs are above an applicable limit, the test cannot be used to determine compliance with an applicable limit.	<u>N-1919-6 and N-1919-16</u> Condition #20 of the each proposed TV permit enforces this requirement.
Section 6.1 states that the records required by Sections 6.1.1 through 6.1.4 must be maintained for five calendar years and be made available to the APCO upon request.	<u>N-1919-6 and N-1919-16</u> Condition #35 of each proposed TV permit enforces this requirement.
Section 6.1.1 lists recordkeeping requirements for any unit operated under the exemption of Section 4.2 of the Rule.	<u>N-1919-6 and N-1919-16</u> Each boiler is permitted to use backup fuels during natural gas curtailment periods. Condition #33 of each proposed TV permit enforces this recordkeeping requirement.
Section 6.1.2 lists recordkeeping requirements for any unit that is a Category H unit listed in Section 5.1.1 Table 1 or any unit that is subject to the requirements of Section 5.2.	This facility does not operate any Category H units or units subject to Section 5.2. Therefore, the requirements of Section 6.1.2 are not applicable.
Section 6.1.3 lists recordkeeping requirements for units that are required to either be tuned up or for units where monthly operational characteristics must be monitored.	The boilers at this facility are not required to be tuned up and monthly operational characteristics are not required to be monitored. Therefore, the recordkeeping requirements of Section 6.1.3 are not applicable.
Section 6.1.4 requires the operator of any unit performing start-up or shutdown keep records of the duration of the start-up or shutdown.	The boilers at this facility are not subject to start-up or shutdown requirements. Therefore, this requirement is not applicable.
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Rule 4306 Requirements	Method of Compliance
<p>Section 6.2.1 states that the fuel higher heating value (HHV) be certified by a third party fuel supplier or determined by</p> <ol style="list-style-type: none"> 1. ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels 2. ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. 	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #16 of each proposed TV permit enforces this requirement</p>
<p>Section 6.2.2 states that the oxides of nitrogen (ppmv) must be determined using EPA Method 7E or ARB Method 100.</p>	<p><u>N-1919-6 and N-1919-16</u></p> <p>Condition #13 of each proposed TV permit enforces this requirement.</p>
<p>Section 6.2.3 states that carbon monoxide (ppmv) must be determined using EPA Method 10 or ARB Method 100.</p>	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #14 of each proposed TV permit enforces this requirement</p>
<p>Section 6.2.4 requires stack gas oxygen be determined using EPA Method 3 or 3A, or ARB Method 100.</p>	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #15 of each proposed TV permit enforces this requirement</p>
<p>Section 6.2.5 requires the NOx emission (lb/MMBtu) be determined using EPA Method 19.</p>	<p><u>N-1919-6 and N-1919-16</u></p> <p>Condition #13 of each proposed TV permit enforces this requirement.</p>
<p>Section 6.2.6 requires the stack gas velocity be determined using EPA Method 2.</p>	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #17 of each proposed TV permit enforces this requirement</p>
<p>Section 6.2.7 requires the stack gas moisture content be determined using EPA Method 4.</p>	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #18 of each proposed TV permit enforces this requirement</p>
<p>Section 6.3.1 requires each unit be source tested to determine compliance at least once every 12 months. For gaseous fired units demonstrating compliance on two consecutive 12-month tests, the next test may be deferred for up to 36 months. During the 36 month source test interval, the operator must tune the unit in accordance, unless monitoring with a CEMS or APCO approved monitoring system where the applicable emission limits are periodically monitored.</p>	<p><u>N-1919-6 and N-1919-16</u></p> <p>The facility uses a portable analyzer to measure emissions monthly, thus tuning is not required. Condition #12 of each proposed TV permit enforces this requirement</p>
<p>Section 6.3.2 lists alternatives to complying with Section 6.3.1</p>	<p>The facility has chosen to comply with Section 6.3.1; therefore, Section 6.3.2 requirements are not applicable.</p>
<p>Sections 6.4, 7.0, and 8.0 and 9.0 list emission control plan, compliance schedule, calculation, alternative emission control requirements.</p>	<p>These requirements are administrative and either don't apply or have already been satisfied. No conditions will be added to the Title V permit.</p>

Rule 4309 - Dryers, Dehydrators, and Ovens

District Rule 4309 is applicable to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 million British thermal units per hour (5.0 MMBtu/hr or greater). Section 4.1.4 states that units used to bake or fry food for human consumption are not subject to the requirements of Rule 4309.

a. Permit Unit N-1919-1

This permit includes two 1.9 MMBtu/hr ovens (direct-fired). These ovens are rated less than 5.0 MMBtu/hr and are used to bake/fry food for human consumption. Therefore, these ovens are not subject to District Rule 4309 requirements.

b. Permit Unit N-1919-2

This permit includes two 5.48 MMBtu/hr ovens (direct-fired). These ovens are used to bake/fry food for human consumption. Therefore, these ovens are not subject to District Rule 4309 requirements.

c. Permit Unit N-1919-3

This permit does not include any fuel-fired equipment. Therefore District Rule 4309 requirements do not apply.

d. Permit Unit N-1919-4

This permit does not include any fuel-fired equipment that is subject to permits. Therefore District Rule 4309 requirements do not apply.

e. Permit Unit N-1919-5

This permit does not include any fuel-fired equipment. Therefore District Rule 4309 requirements do not apply.

f. Permit Unit N-1919-6

This permit includes a boiler that is indirect fired and does not include any units subject to District Rule 4309 requirements.

g. Permit Unit N-1919-7

This permit does not include any fuel-fired equipment. Therefore District Rule 4309 requirements do not apply.

h. Permit Unit N-1919-8

This permit does not include any fuel-fired equipment. Therefore District Rule 4309 requirements do not apply.

i. Permit Unit N-1919-11

This permit does not include any fuel-fired equipment. Therefore District Rule 4309 requirements do not apply.

j. Permit Unit N-1919-12

This permit does not include any fuel-fired equipment. Therefore District Rule 4309 requirements do not apply.

k. Permit Unit N-1919-13

This permit does not include any fuel-fired equipment. Therefore District Rule 4309 requirements do not apply.

l. Permit Unit N-1919-14

This permit does not include any fuel-fired equipment. Therefore District Rule 4309 requirements do not apply.

m. Permit Unit N-1919-16

This permit includes a boiler that is indirect fired and does not include any units subject to District Rule 4309 requirements.

District Rule - 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr

The following tables demonstrate how the proposed TV permit will ensure compliance with District Rule 4320.

Rule 4320 Requirements	Method of Compliance
<p>Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler, process heater, or steam generator with a total rated heat input greater than 5 million Btu per hour.</p>	<p>The two boilers at this facility, N-1919-6 and N-1919-16, are gaseous fired units that are rated at 50.5 MMBtu/hr and 50 MMBtu/hr respectively. Therefore, District Rule 4320 requirements are applicable to each of these units.</p>
<p>Section 4.2 states that the requirements of Section 5.1 and 5.3 do not apply when burning a fuel other than PUC quality natural gas during natural gas curtailment provided: 1) fuels other than natural gas are burned no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing, and 2) NOx emissions do not exceed 150 ppmv or 0.215 lb/MMBtu.</p>	<p><u>N-1919-6 and N-1919-16</u> Each of these boilers is permitted to fire on LPG/Propane backup during natural gas curtailment. Conditions #9, #28, and #29 of each proposed TV permit enforces the hour restrictions and testing requirements for the backup fuel.</p>
<p>Section 5.1 states that an operator of a unit subject to this rule must comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis:</p> <ol style="list-style-type: none"> 1. Operate the unit to comply with the emission limits of Sections 5.2 and 5.4; or 2. Pay an annual emission fee to the District as specified in Section 5.3 and comply with the control requirements as specified in Section 5.4; or 3. Comply with the applicable Low-use Unit requirements of Section 5.5. 	<p>This facility chose option number 1, to comply with the emission limits of Sections 5.2 and 5.4.</p>
<p>Section 5.2.1 states that boilers must not be operated in a manner which exceeds a carbon monoxide emissions limit of 400 ppmv.</p>	<p><u>N-1919-6 and N-1919-16</u> Condition #10 of each proposed TV permit enforces this requirement by limiting each boiler to 100 ppmvd CO @ 3% O₂ when fired on the primary fuel.</p>
<p>Section 5.2.2 states that no unit fired on liquid fuel may be operated in a manner to exceed emissions of 40 ppmv NOx or 400 ppmv CO.</p>	<p>Each unit is only fired on gaseous fuel; therefore, this requirement is not applicable.</p>
<p>Section 5.2.3 Table 1 lists the following NOx emission limit for a boiler rated greater than 20 MMBtu/hr: NOx: 7 ppmv @ 3% O₂ or 0.008 lb/MMBtu</p>	<p><u>N-1919-6 and N-1919-16</u> Condition #10 of each proposed TV permit enforces this requirement by limiting each boiler to 7 ppmvd NOx @ 3% O₂ when fired on the primary fuel.</p>
<p>Section 5.2.4 lists an equation to use if the boiler is operated on combinations of gaseous and liquid fuel.</p>	<p>Both boilers are only fired on gaseous fuel; therefore, this requirement is not applicable.</p>
<p>Section 5.2.5 lists requirements for units that are designated to comply with a staged enhanced schedule limit for NOx.</p>	<p>Neither unit is designated to comply with a staged enhanced schedule NOx limit. Thus, this requirement is not applicable.</p>
<p>Section 5.3 lists requirements for annual fees calculations.</p>	<p>The operator chose to comply with the emission limits of Sections 5.2 and 5.4 rather than pay emission fees. Therefore, the requirements of Section 5.3 are not applicable to these units.</p>

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Rule 4320 Requirements	Method of Compliance
<p>Section 5.4.1 states that the operator must comply with one of the following requirements:</p> <ol style="list-style-type: none"> 1. Fire the unit exclusively on PUC-quality natural gas, commercial propane, or a combination of such gases; or 2. Limit fuel sulfur content to no more than five grains of total sulfur per 100 standard cubic feet; or 3. Install and properly operate an emission control system that reduces SO₂ emissions by at least 95% by weight or limit exhaust SO₂ to less than or equal to 9 ppmv corrected to 3.0 % O₂. 	<p><u>N-1919-6 and N-1919-16</u></p> <p>Each boiler is only operated on PUC-quality natural gas or commercial LPG/propane. Condition #7 of each proposed TV permit enforces this requirement.</p>
<p>Section 5.4.2 states that liquid fuel may only be used during PUC quality natural gas curtailment and further outlines requirements for the liquid fuel.</p>	<p>Neither boiler operates using liquid fuel; therefore, the requirements of Section 5.4.2 are not applicable.</p>
<p>Section 5.5 lists requirements for low-use units limited to less than 1.8 billion Btu per calendar year.</p>	<p>Neither unit is limited to 1.8 billion Btu per calendar year. Therefore, the requirements of Section 5.5 are not applicable.</p>
<p>Section 5.6 lists startup and shutdown requirements.</p>	<p>The permit for each boiler does not include any relief from the permitted emission limits during startup and shutdown periods. Therefore, the startup and shutdown requirements are not applicable.</p>
<p>Section 5.7.1 states that an unit subject to the emission limits in Section 5.2, must be equipped with either an operational APCO approved Continuous Emissions Monitoring System for NO_x, CO and Oxygen, or be equipped with an APCO-approved alternate monitoring system.</p>	<p><u>N-1919-6 and N-1919-16</u></p> <p>Each boiler is equipped with an APCO-approved alternate monitoring system. Conditions #24 through #27 of each proposed TV permit enforce this requirement.</p>
<p>Section 5.7.2 states that for units subject to the requirements of Section 5.5.1 or 5.5.2, the operator must monitor the operational characteristics recommended by the manufacturer and approved by the APCO.</p>	<p>Neither boiler is subject to the requirements of Sections 5.5.1 or 5.5.2; therefore, the requirements of Section 5.7.2 are not applicable.</p>
<p>Section 5.7.3 states that any unit subject to Section 5.5 must install and maintain an operational non-resettable, totalizing mass or volumetric flow line to each unit.</p>	<p>Neither boiler is subject to Section 5.5; therefore, this requirement is not applicable.</p>
<p>Section 5.7.4 states that units operated at seasonal sources that are subject to the requirements of 40 CFR 60 Subpart Db may implement an APCO approved parametric monitoring system (PMS) in lieu of a CEMS, provided certain conditions are met.</p>	<p>Neither boiler is subject to 40 CFR 60 Subpart Db; therefore, this requirement is not applicable.</p>
<p>Section 5.7.5 states that the APCO must not approve an alternative monitoring system unless it is documented that continued operation within the ranges of specified emissions-related performance indicators or operations characteristics provides a reasonable assurance of compliance with the applicable emission limits.</p>	<p>The approved APCO monitoring system measures emissions directly, using a portable analyzer. This condition is satisfied.</p>
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Rule 4320 Requirements	Method of Compliance
Section 5.7.6 states that operators complying with Sections 5.4.1.1 or 5.4.1.2 must provide an annual fuel analysis to the District unless a more frequent sampling and reporting period is included in the Permit to Operate.	<u>1919-6 and N-1919-16</u> Conditions #31 and #32 of each proposed TV permit enforce this requirement
Section 5.8.1 states that an operator of any unit has the option of complying with either the heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1.	<u>N-1919-6 and N-1919-16</u> Condition #22 of the each proposed TV permit enforces this requirement.
Section 5.8.2 states that all emissions measurements must be made with the unit operating at either conditions representative of normal operations or conditions specified in the Permit to Operate.	<u>N-1919-6 and N-1919-16</u> Condition #19 of each proposed TV permit enforces this requirement.
Section 5.8.3 states that all continuous emission monitoring system (CEMS) measurements must be averaged over a period of 15 consecutive minutes.	Neither boiler is equipped with a CEMS; therefore, this requirement is not applicable.
Section 5.8.4 states that for emissions monitoring pursuant to 5.7.1 and 6.3.1 using a portable NOx analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings must be averaged over a 15 minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15-consecutive minute period.	<u>N-1919-6 and N-1919-16</u> Condition #26 of each proposed TV permit enforces this requirement.
Section 5.8.5 states that for emission source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard of this Rule, the arithmetic average of three 30-minute consecutive-minute test runs shall apply. If two of the three runs are above an applicable limit, the test cannot be used to determine compliance with an applicable limit.	<u>N-1919-6 and N-1919-16</u> Condition #20 of each proposed TV permit enforces this requirement.
Section 6.1 states that the records required by Sections 6.1.1 through 6.1.5 must be maintained for five calendar years and be made available to the APCO upon request.	<u>N-1919-6 and N-1919-16</u> Condition #35 of each proposed TV permit enforces this requirement.
Section 6.1.1 lists recordkeeping requirements for any unit operated under the exemption of Section 4.2 of the Rule.	<u>N-1919-6 and N-1919-16</u> Each boiler is permitted to use backup fuels during natural gas curtailment periods. Condition #33 of each proposed TV permit enforces this recordkeeping requirement.
Section 6.1.2 lists recordkeeping requirements for any unit that is a Section 5.5.	Neither unit is subject to Section 5.5; therefore, the requirements of Section 6.1.2 are not applicable.
Section 6.1.3 lists recordkeeping requirements for units that are required to either be tuned up or for units where monthly operational characteristics must be monitored.	The boilers at this facility are not required to be tuned up and monthly operational characteristics are not required to be monitored. Therefore, the recordkeeping requirements of Section 6.1.3 are not applicable.
Section 6.1.4 requires the operator of any unit performing start-up or shutdown keep records of the duration of the start-up or shutdown.	The boilers at this facility are not subject to start-up or shutdown requirements. Therefore, this requirement is not applicable.
Section 6.1.5 requires the operator of any unit firing on liquid fuel during a PUC-quality natural gas curtailment to record the sulfur content of the fuel used, and duration of the natural gas curtailment period.	Neither boiler is permitted to operate on a liquid fuel during natural gas curtailment periods. Therefore, the recordkeeping requirements of this section are not applicable.
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Rule 4320 Requirements	Method of Compliance
<p>Section 6.2.1 states that the fuel higher heating value (HHV) be certified by a third party fuel supplier or determined by</p> <ol style="list-style-type: none"> 1. ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels 2. ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. 	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #16 of each proposed TV permit enforces this requirement</p>
<p>Section 6.2.2 states that the oxides of nitrogen (ppmv) must be determined using EPA Method 7E or ARB Method 100.</p>	<p><u>N-1919-6 and N-1919-16</u></p> <p>Condition #13 of each proposed TV permit enforces this requirement.</p>
<p>Section 6.2.3 states that carbon monoxide (ppmv) must be determined using EPA Method 10 or ARB Method 100.</p>	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #14 of each proposed TV permit enforces this requirement</p>
<p>Section 6.2.4 requires stack gas oxygen be determined using EPA Method 3 or 3A, or ARB Method 100.</p>	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #15 of each proposed TV permit enforces this requirement</p>
<p>Section 6.2.5 requires the NOx emission (lb/MMBtu) be determined using EPA Method 19.</p>	<p><u>N-1919-6 and N-1919-16</u></p> <p>Condition #13 of each proposed TV permit enforces this requirement.</p>
<p>Section 6.2.6 requires the stack gas velocity be determined using EPA Method 2.</p>	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #17 of each proposed TV permit enforces this requirement</p>
<p>Section 6.2.7 requires the stack gas moisture content be determined using EPA Method 4.</p>	<p><u>1919-6 and N-1919-16</u></p> <p>Condition #18 of each proposed TV permit enforces this requirement</p>
<p>Sections 6.2.8 through 6.2.10 list approved methods for determining the oxides of sulfur, fuel H₂S content, and sulfur content of liquid fuels.</p>	<p>These boilers are fired on PUC-quality natural gas and commercial LPG/propane. Testing for sulfur emissions is not required for units firing solely on these fuels; therefore, these requirements will not be listed on the proposed TV permit.</p>
<p>Section 6.3.1 requires each unit be source tested to determine compliance at least once every 12 months. For gaseous fired units demonstrating compliance on two consecutive 12-month tests, the next test may be deferred for up to 36 months. During the 36 month source test interval, the operator must tune the unit in accordance, unless monitoring with a CEMS or APCO approved monitoring system where the applicable emission limits are periodically monitored.</p>	<p><u>N-1919-6 and N-1919-16</u></p> <p>The facility uses a portable analyzer to measure emissions monthly, thus tuning is not required. Condition #12 of each proposed TV permit enforces this requirement</p>
<p>Section 6.3.2 lists alternatives to complying with Section 6.3.1</p>	<p>The facility has chosen to comply with Section 6.3.1; therefore, Section 6.3.2 requirements are not applicable.</p>
<p>Sections 6.4, 7.0, and 8.0 list emission control plan, compliance schedule, and calculation requirements.</p>	<p>These requirements have all been satisfied and will not be included on the TV permit.</p>

District Rule 4351 - Boilers, Steam Generators, and Process Heaters – Phase 1

The following tables demonstrate how the proposed TV permit will ensure compliance with District Rule 4351.

Rule 4351 Requirements	Method of Compliance
Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler, process heater, or steam generator with a total rated heat input greater than 5 million Btu per hour and is included in a major NOx source.	The two boilers at this facility, N-1919-6 and N-1919-16, are gaseous fired units that are rated at 50.5 MMBtu/hr and 50 MMBtu/hr respectively, and are included at a Major NOx Source. Therefore, District Rule 4351 requirements are applicable to each of these units.
Section 4.2 states that the requirements of Section 5.1 and 5.3 do not apply when burning a fuel other than PUC quality natural gas during natural gas curtailment provided fuels other than natural gas are burned no more than 336 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing.	<u>N-1919-6 and N-1919-16</u> Each of these boilers is permitted to fire on LPG/Propane backup during natural gas curtailment. Condition #9 of each proposed TV permit enforces the hour restriction on the backup fuel.
Section 5.1 lists an emission limit of 147 ppmv or 0.18 lb/MMBtu NOx for natural and induced draft units.	<u>N-1919-6 and N-1919-16</u> The boilers are each induced draft units. Condition #10 of each proposed TV permit enforces this requirement by limiting each boiler to 7 ppmvd NOx @ 3% O ₂ when fired on the primary fuel.
Section 5.2 offers options, to comply with Rule 4351, in lieu of meeting Section 5.1 emission requirements.	<u>N-1919-6 and N-1919-16</u> Each unit will meet the Section 5.1 emission requirements. Therefore, Section 5.2 requirements are not applicable.
Section 5.3 lists requirements for low-use units limited to less than 9 billion Btu per calendar year.	Neither unit is limited to 9 billion Btu per calendar year. Therefore, the requirements of Section 5.5 are not applicable.
Section 5.4 lists requirements for units that are fired simultaneously on gaseous and liquid fuels.	Neither boiler operates using liquid fuel; therefore, the requirements of Section 5.4 are not applicable.
Section 5.5 states that boilers must not be operated in a manner which exceeds a carbon monoxide emissions limit of 400 ppmv.	<u>N-1919-6 and N-1919-16</u> Condition #10 of each proposed TV permit enforces this requirement by limiting each boiler to 100 ppmvd CO @ 3% O ₂ when fired on the primary fuel.
Section 5.6 states that a totalizing mass or volumetric flow rate meter must be installed for each fuel line on any unit that simultaneously fires on combinations of different fuels.	Neither boiler operates simultaneously on a combination of different fuels. Therefore the requirements of Section 5.6 are not applicable.
Section 5.7.1 states that an operator of any unit has the option of complying with either the heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1.	<u>N-1919-6 and N-1919-16</u> Condition #22 of the each proposed TV permit enforces this requirement.
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Rule 4351 Requirements	Method of Compliance
Section 5.7.2 states that all emissions measurements must be made with the unit operating at either conditions representative of normal operations or conditions specified in the Permit to Operate.	<u>N-1919-6 and N-1919-16</u> Condition #19 of each proposed TV permit enforces this requirement.
Section 6.1 states that the records required by Sections 6.1.1 through 6.1.5 must be maintained for five calendar years and be made available to the APCO upon request.	<u>N-1919-6 and N-1919-16</u> Condition #35 of each proposed TV permit enforces this requirement.
Section 6.1.1 states that the owner must monitor and record for each unit, the hhv and cumulative annual use of each fuel.	<u>N-1919-6 and N-1919-16</u> Condition #34 of each proposed TV permit enforces this requirement.
Section 6.1.2 lists recordkeeping requirements for any unit operated under the exemption of Section 4.2 of the Rule.	<u>N-1919-6 and N-1919-16</u> Each boiler is permitted to use backup fuels during natural gas curtailment periods. Condition #33 of each proposed TV permit enforces this recordkeeping requirement.
Section 6.1.3 list recordkeeping requirements for any unit operated under the exemption of Section 4.3 of the Rule (standby units).	Neither boiler is a standby unit that uses the exemption of Section 4.3. Therefore, the requirements of Section 6.1.3 are not applicable.
Section 6.2.1 states that the fuel higher heating value (HHV) be certified by a third party fuel supplier or determined by 1. ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels 2. ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels.	<u>1919-6 and N-1919-16</u> Condition #16 of each proposed TV permit enforces this requirement
Section 6.2.2 states that the oxides of nitrogen (ppmv) must be determined using EPA Method 7E or ARB Method 100.	<u>N-1919-6 and N-1919-16</u> Condition #13 of each proposed TV permit enforces this requirement.
Section 6.2.3 states that carbon monoxide (ppmv) must be determined using EPA Method 10 or ARB Method 100.	<u>1919-6 and N-1919-16</u> Condition #14 of each proposed TV permit enforces this requirement
Section 6.2.4 requires stack gas oxygen be determined using EPA Method 3 or 3A, or ARB Method 100.	<u>1919-6 and N-1919-16</u> Condition #15 of each proposed TV permit enforces this requirement
Section 6.2.5 requires the NOx emission (lb/MMBtu) be determined using EPA Method 19.	<u>N-1919-6 and N-1919-16</u> Condition #13 of each proposed TV permit enforces this requirement.
Section 6.2.6 requires the stack gas velocity be determined using EPA Method 2.	<u>1919-6 and N-1919-16</u> Condition #17 of each proposed TV permit enforces this requirement
Continued on Next Page	

Frito-Lay Inc
 N-1919
 N-1111412

Rule 4351 Requirements	Method of Compliance
Section 6.2.7 requires the stack gas moisture content be determined using EPA Method 4.	1919-6 and N-1919-16 Condition #18 of each proposed TV permit enforces this requirement
Section 6.3.1 requires each unit be source tested to determine compliance at least once every 12 months. For gaseous fired units demonstrating compliance on two consecutive 12-month tests, the next test may be deferred for up to 36 months. During the 36 month source test interval, the operator must tune the unit in accordance, unless monitoring with a CEMS or APCO approved monitoring system where the applicable emission limits are periodically monitored.	N-1919-6 and N-1919-16 The facility uses a portable analyzer to measure emissions monthly, thus tuning is not required. Condition #12 of each proposed TV permit enforces this requirement
Section 6.3.2 lists alternatives to complying with Section 6.3.1	The facility has chosen to comply with Section 6.3.1; therefore, Section 6.3.2 requirements are not applicable.
Sections 6.4, 7.0, and 8.0 list emission control plan, compliance schedule, and calculation requirements.	These requirements have all been satisfied and will not be included on the TV permit.

District Rule 4801 - Sulfur Compounds

This rule is applicable to units that emit sulfur compounds. This facility includes units fired on PUC-Quality natural gas, and LPG/Propone that has less than 15 grains of sulfur per dscf of fuel.

District Rule 4801 was last amended on December 17, 1992, and has been submitted to the EPA to replace Stanislaus County Rule 407 in the SIP. This District Rule is at least as stringent as the county rule, as demonstrated by the following comparison:

Comparison of District Rule 4801 and Stanislaus County Rule 407		
REQUIREMENT	Rule 4801	Rule 407
A person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

Natural Gas Combustion

For natural gas combustion at a reference state of 60 °F, the Rule 4801 limit of 2,000 ppmvd is equivalent to:

$$\frac{(2000 \text{ ppmvd}) \left(8,578 \frac{\text{dscf}}{\text{MMBtu}} \right) \left(64 \frac{\text{lb} - \text{SO}_x}{\text{lb} - \text{mol}} \right)}{\left(379.5 \frac{\text{dscf}}{\text{lb} - \text{mol}} \right) (10^6)} \cong 2.9 \frac{\text{lb} - \text{SO}_x}{\text{MMBtu}}$$

The gas-fired units at this facility use natural gas with a total fuel sulfur (S) content of 1.0 grain per 100 scf (PUC-Quality natural gas) as the primary fuel, which results in a SO_x emission rate of 0.00285 lb/MMBtu. Therefore, it is expected that each unit fired on natural gas will have a SO_x emission concentration less than the 2000 ppmvd.

LPG/Propane Fuel Combustion

The units at this facility also may be fired on LPG/Propane fuel. At a reference state of 60 °F, the Rule 4801 limit of 2,000 ppmvd is equivalent to:

$$\frac{(2000 \text{ ppmvd}) \left(8,578 \frac{\text{dscf}}{\text{MMBtu}} \right) \left(64 \frac{\text{lb} - \text{SO}_x}{\text{lb} - \text{mol}} \right)}{\left(379.5 \frac{\text{dscf}}{\text{lb} - \text{mol}} \right) (10^6)} \cong 2.9 \frac{\text{lb} - \text{SO}_x}{\text{MMBtu}}$$

The units at this facility use LPG/Propane with a sulfur content of 15 grains of sulfur per 100 scf. Use of LPG/Propane fuel with this sulfur content results in a SO_x emission rate of 0.0166 lb/MMBtu (District Project N-1093496). Therefore, it is expected that each unit fired on LPG/Propane fuel will have a SO_x emission concentration less than 2000 ppmvd.

Summary

The following table demonstrates how each permit unit will comply with District Rule 4801 requirements.

Draft TV Permit	Condition(s) Requiring Rule 4801 Compliance
N-1919-1-7	#2
N-1919-2-8	#2
N-1919-3-8	N/A, no fuel-fired equipment
N-1919-4-6	N/A, no fuel-fired equipment
N-1919-5-2	N/A, no fuel-fired equipment
N-1919-6-9	#4
N-1919-7-7	N/A, no fuel-fired equipment
N-1919-8-6	N/A, no fuel-fired equipment
N-1919-11-3	N/A, no fuel-fired equipment
N-1919-12-2	N/A, no fuel-fired equipment
N-1919-13-3	N/A, no fuel-fired equipment
N-1919-14-2	N/A, no fuel-fired equipment
N-1919-16-2	#4

40 CFR 64 - Compliance Assurance Monitoring (CAM)

§64.2 – Applicability

This section requires Compliance Assurance Monitoring (CAM) for units that meet the following criteria:

- 1) the facility must be a major source
- 2) the unit must have an emission limit for the pollutant;
- 3) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 4) the unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (lb/year)
VOC	20,000
NO _x	20,000
CO	200,000
PM ₁₀	140,000
SO _x	140,000

This facility is a Major Source for NO_x emissions. Thus, a CAM determination is required.

a. Permit Unit N-1919-1

This permit is for a tortilla chip line with two 3.2 MMBtu/hr direct-fired ovens, a seasonator, and an ambient air cooler served by a high velocity air filter. The permit includes emission limits for all pollutants emitted. The only control device identified is the high velocity air filter serving the ambient air cooler. The high velocity air filter reduces PM₁₀ emissions.

The controlled ambient air cooler emissions are:

$$PE_{PM10, \text{ controlled}} = 5.0 \text{ lb/day} \times 365 \text{ days/year} = 1,825 \text{ lb-PM10/year}$$

To determine if CAM is triggered for this unit, the uncontrolled emission rate must be determined. Pursuant to the application review for District Project N-1011474, the high velocity air filter has a rated PM₁₀ control efficiency of 70%. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 1,825 \text{ lb-PM10/year} \div (1-0.7)$$
$$PE_{PM10, \text{ uncontrolled}} = 6,083 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

b. Permit Unit N-1919-2

This permit is for a tortilla chip line consisting of two steam-heated pre-cookers, two direct-fired ovens, and one steam-heated cooker and mechanical seasoner. There are no control devices associated with any of these units. Therefore, CAM is not triggered for any emission units associated with this permit.

c. Permit Unit N-1919-3

This permit is for a tortilla chip line consisting of a steam powered heat exchanger system providing heat to a cooker that is served by an oil mist eliminator, and a mechanical seasoner. The permit includes emission units for all pollutants emitted. The only control device associated with this equipment is the mist eliminator, which is used to reduce PM10 emissions from the tortilla chip cooker.

The controlled emissions from the cooker are:

$$PE_{PM10, \text{ controlled}} = 45.4 \text{ lb/day} \times 365 \text{ days/year} = 16,571 \text{ lb-PM10/year}$$

Pursuant to AP-42 Appendix B.2, Table B.2-3, the PM10 control efficiency for a low-velocity mist eliminator ranges from 5% to 75%, depending on the particle size. Conservatively, a PM10 control efficiency of 75% will be assumed for this operation. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 16,571 \text{ lb-PM10/year} \div (1-0.75)$$
$$PE_{PM10, \text{ uncontrolled}} = 66,284 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

d. Permit Unit N-1919-4

This permit is for a potato chip line consisting of a cooker with a steam powered heat exchanger and served by a mist eliminator, two post cooker conditioning units, and a mechanical seasoner. The permit includes emission units for all pollutants emitted. The only control device associated with this equipment is the mist eliminator, which is used to reduce PM10 emissions from the potato chip cooker.

The controlled emissions from the cooker are:

$$PE_{PM10, \text{ controlled}} = 8.9 \text{ lb/day} \times 365 \text{ days/year} = 3,249 \text{ lb-PM10/year}$$

Pursuant to AP-42 Appendix B.2, Table B.2-3, the PM10 control efficiency for a low-velocity mist eliminator ranges from 5% to 75%, depending on the particle size. Conservatively, a PM10 control efficiency of 75% will be assumed for this operation. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 3,249 \text{ lb-PM10/year} + (1-0.75)$$
$$PE_{PM10, \text{ uncontrolled}} = 12,996 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

e. Permit Unit N-1919-5

This permit is for a corn receiving, storage, and handling system served by a dust collection system. The permit includes emission limits for all pollutants emitted by this equipment. The dust collection system is a control device that reduces PM10 emissions from this operation.

The controlled emissions from this operation are:

$$PE_{PM10, \text{ controlled}} = 7.4 \text{ lb/day} \times 365 \text{ days/year} = 2,701 \text{ lb-PM10/year}$$

Pursuant to District Project N-904501 for this unit, the dust collection system was estimated to achieve a PM10 control efficiency of 90%. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 2,701 \text{ lb-PM10/year} + (1-0.9)$$
$$PE_{PM10, \text{ uncontrolled}} = 27,010 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

f. Permit Unit N-1919-6

This permit is for a 50.5 MMBtu/hr natural gas and propane/LPG-fired boiler. The permit includes emission limits for all pollutants emitted by this equipment. The unit is equipped with flue gas recirculation, which is considered to be a NOx control device.

The controlled emission rate from this boiler, shown below, was obtained from District Project N-1093496 and is shown below:

$$PE_{NOx, \text{ controlled}} = 3,541 \text{ lb-NOx/year}$$

Based on emission factors from AP-42, Table 1.4-1, July 1998, the FGR provides approximately 36% control of NO_x emissions.

$$PE_{NOx, \text{ uncontrolled}} = 3,541 \text{ lb-NOx/year} + (1-0.36)$$
$$PE_{NOx, \text{ uncontrolled}} = 5,533 \text{ lb-NOx/year}$$

Since the uncontrolled NO_x emission rate is less than the NO_x Major Source Threshold of 20,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

g. Permit Unit N-1919-7

This permit is for a sun chip line consisting of a hammermill, three steam powered pre-cookers, and a fryer. The permit contains emission limits for each pollutant emitted by this equipment. The hammermill is served by a rotoclone, which reduces PM₁₀ emissions. The cooker is served by a mist eliminator, which also reduces PM₁₀ emissions.

Hammermill served by rotoclone:

The controlled emissions from the hammermill are:

$$PE_{PM10, \text{ controlled}} = 0.1 \text{ lb/day} \times 365 \text{ days/year} = 37 \text{ lb-PM10/year}$$

Pursuant to the application review for District Project N-1081277, the rotoclone achieves a control efficiency of 65% for PM₁₀. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 37 \text{ lb-PM10/year} + (1-0.65)$$
$$PE_{PM10, \text{ uncontrolled}} = 106 \text{ lb-PM10/year}$$

Since the uncontrolled PM₁₀ emission rate is less than the PM₁₀ Major Source Threshold of 140,000 lb/year, CAM is not triggered.

Cooker/fryer served by mist eliminator:

The controlled emissions from the cooker are:

$$PE_{PM10, \text{ controlled}} = 9.5 \text{ lb/day} \times 365 \text{ days/year} = 3,468 \text{ lb-PM10/year}$$

Pursuant to AP-42 Appendix B.2, Table B.2-3, the PM10 control efficiency for a low-velocity mist eliminator ranges from 5% to 75%, depending on the particle size. Conservatively, a PM10 control efficiency of 75% will be assumed for this operation. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 3,468 \text{ lb-PM10/year} + (1-0.75)$$
$$PE_{PM10, \text{ uncontrolled}} = 13,872 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered.

Summary:

In summary, CAM is not triggered for any emission units associated with this permit.

h. Permit Unit N-1919-8

This permit is for a fried cheese puff line consisting of a pneumatic corn meal transfer system, two blenders, six extruders, one chaff tumbler, a fryer, and a seasoner. The permit includes emission limits for the pneumatic meal transfer system, the extruding operation, and the fryer. The pneumatic meal transfer system is served by a dust collector which controls PM10. The extruder is served by a rotoclone for control of PM10. Finally, the fryer is served by a mist eliminator for control of PM10.

Pneumatic meal transfer system served by a dust collector:

The controlled emissions from this operation are:

$$PE_{PM10, \text{ controlled}} = 0.2 \text{ lb/day} \times 365 \text{ days/year} = 73 \text{ lb-PM10/year}$$

Pursuant to District Project N-1053921 for this unit, the dust collection system was estimated to achieve a PM10 control efficiency of 99%. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 73 \text{ lb-PM10/year} + (1-0.99)$$
$$PE_{PM10, \text{ uncontrolled}} = 7,300 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered.

Extruder served by rotoclone:

The controlled emissions from the extruder are:

$$PE_{PM10, \text{ controlled}} = 1.9 \text{ lb/day} \times 365 \text{ days/year} = 694 \text{ lb-PM10/year}$$

Pursuant to the application review for District Project N-1081277, a rotoclone achieves a control efficiency of 65% for PM10. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 694 \text{ lb-PM10/year} + (1-0.65)$$

$$PE_{PM10, \text{ uncontrolled}} = 1,983 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered.

Cooker/fryer served by mist eliminator:

The controlled emissions from the cooker are:

$$PE_{PM10, \text{ controlled}} = 6.5 \text{ lb/day} \times 365 \text{ days/year} = 2,373 \text{ lb-PM10/year}$$

Pursuant to AP-42 Appendix B.2, Table B.2-3, the PM10 control efficiency for a low-velocity mist eliminator ranges from 5% to 75%, depending on the particle size. Conservatively, a PM10 control efficiency of 75% will be assumed for this operation. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 2,373 \text{ lb-PM10/year} + (1-0.75)$$

$$PE_{PM10, \text{ uncontrolled}} = 9,492 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered.

Summary:

In summary, CAM is not triggered for any emission units associated with this permit.

i. Permit Unit N-1919-11

This permit is for a starch dryer. The permit includes a limit for PM10 emissions and the starch dryer is served by a dust collector that controls PM10 emissions.

The controlled emissions from this operation are:

$$PE_{PM10, \text{ controlled}} = 1,500 \text{ lb-starch/hr} \times \text{ton-starch}/2000 \text{ lb} \times 0.0026 \text{ lb-PM10/ton starch} \times 8760 \text{ hr/year}$$
$$PE_{PM10, \text{ controlled}} = 17 \text{ lb-PM10/year}$$

Pursuant to District Project N-1081277 for this unit, the dust collection system was estimated to achieve a PM10 control efficiency of 99%. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 17 \text{ lb-PM10/year} + (1-0.99)$$
$$PE_{PM10, \text{ uncontrolled}} = 1,700 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

i. Permit Unit N-1919-12

This permit is for a corn meal transfer system that transfers corn meal from railcars to two silos. The permit includes a limit for PM10 emissions and this operation is served by dust collectors that controls PM10 emissions.

The controlled emissions from this operation are:

$$PE_{PM10, \text{ controlled}} = 0.3 \text{ lb/day} \times 365 \text{ days/year} = 110 \text{ lb-PM10/year}$$

Pursuant to District Project N-1081277 for this unit, the dust collection system was estimated to achieve a PM10 control efficiency of 99%. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 110 \text{ lb-PM10/year} + (1-0.99)$$
$$PE_{PM10, \text{ uncontrolled}} = 11,000 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

k. Permit Unit N-1919-13

This permit is for a potato starch transfer and storage operation. The permit includes a limit for PM10 emissions and this operation and this operation is served by a filter receiver that reduces PM10 emissions.

The controlled emissions from this operation are:

$$PE_{PM10, \text{ controlled}} = 36,000 \text{ lb/day} \times \text{ton}/2000 \text{ lb} \times 0.026 \text{ lb-PM10/ton} \\ \times 365 \text{ days/year}$$
$$PE_{PM10, \text{ controlled}} = 171 \text{ lb-PM10/year}$$

Pursuant to District Project N-1081277 for this unit, the dust collection system was estimated to achieve a PM10 control efficiency of 99%. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 171 \text{ lb-PM10/year} + (1-0.99)$$
$$PE_{PM10, \text{ uncontrolled}} = 17,100 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

l. Permit Unit N-1919-14

This permit is for a potato starch loadout operation. The permit includes a limit for PM10 emissions and this operation is served by a baghouse that reduces PM10 emissions.

The controlled emissions from this operation are:

$$PE_{PM10, \text{ controlled}} = 172,645 \text{ lb/day} \times \text{ton}/2000 \text{ lb} \times 0.0022 \text{ lb-PM10/ton} \\ \times 365 \text{ days/year}$$
$$PE_{PM10, \text{ controlled}} = 69 \text{ lb-PM10/year}$$

Pursuant to District Project N-1031785 for this unit, the baghouse is estimated to achieve a PM10 control efficiency of 99%. Thus,

$$PE_{PM10, \text{ uncontrolled}} = 69 \text{ lb-PM10/year} + (1-0.99)$$
$$PE_{PM10, \text{ uncontrolled}} = 6,900 \text{ lb-PM10/year}$$

Since the uncontrolled PM10 emission rate is less than the PM10 Major Source Threshold of 140,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

m. Permit Unit N-1919-16

This permit is for a 50 MMBtu/hr natural gas and propane/LPG-fired boiler. The permit includes emission limits for all pollutants emitted by this equipment. The unit is equipped with flue gas recirculation, which is considered to be a NO_x control device.

The controlled emission rate from this boiler, shown below, was obtained from District Project N-1093496 and is shown below:

$$PE_{NO_x, \text{ controlled}} = 4,314 \text{ lb-NO}_x/\text{year}$$

Based on emission factors from AP-42, Table 1.4-1, July 1998, the FGR provides approximately 36% control of NO_x emissions.

$$PE_{NO_x, \text{ uncontrolled}} = 4,314 \text{ lb-NO}_x/\text{year} + (1-0.36)$$
$$PE_{NO_x, \text{ uncontrolled}} = 6,741 \text{ lb-NO}_x/\text{year}$$

Since the uncontrolled NO_x emission rate is less than the NO_x Major Source Threshold of 20,000 lb/year, CAM is not triggered. In summary, CAM is not triggered for any emission units associated with this permit.

CAM Summary

As demonstrated above, CAM is not triggered for any of the units at this facility.

X. PERMIT SHIELDS

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By using the model general permit template(s) listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template(s). The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

N-1919-6 and N-1919-16

The applicant is requesting the permit shields from District Rules 1081, 4201, 4301, 4305, and 4801, the subsumed Stanislaus County rules, and from acid rain provisions for the two boilers. The following permit shields will be included on Draft TV permits N-1919-6-9 and N-1919-16-2:

- *Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Stanislaus County Rule 407; SJVUAPCD Rule 4801 (Last Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2]*
- *Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 (Last Amended December 17, 1992) and 4301 (Last Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2]*
- *Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 1081 (Last Amended December 16, 1993), Stanislaus County Rule 108.1. [District Rule 2520, 13.2]*
- *Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305 (Last Amended August 21, 2003), Sec. 4.2, 5.1.1, 5.1.2,, 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 (Last Amended August 21, 2003) Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2]*
- *{2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2]*

XI. PERMIT CONDITIONS

See Draft Title V operating permits beginning on the following page.

San Joaquin Valley Air Pollution Control District

FACILITY: N-1919-0-1

EXPIRATION DATE: 10/31/2012

FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: FRITO-LAY INC
Location: 800 GARNER RD, MODESTO, CA 95357-0514
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9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

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FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-1-7

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 1.9 MMBTU/HR OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER.

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. The ovens shall be fired primarily on natural gas fuel. LPG fuel shall only be used during periods of natural curtailment, and the use of LPG shall not exceed 384 hours in a calendar year. [District Rule 2201 and 4801] Federally Enforceable Through Title V Permit
3. The combustion equipment shall be equipped with a mass or volumetric fuel flow meter capable of measuring the natural gas and LPG fuel usages. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from natural gas combustion in each oven shall not exceed any of the following emission limits: 0.1 lb-NO_x/MMBtu, 0.0029 lb-SO_x/MMBtu, 0.012 lb-PM₁₀/MMBtu, 0.47 lb-CO/MMBtu, and 0.0053 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from LPG fuel combustion in each oven shall not exceed any of the following emission limits: 14 lb-NO_x/1,000 gal, 0.45 lb-SO_x/1,000 gal, 0.40 lb-PM₁₀/1,000 gal, 42.535 lb-CO/1,000 gal, and 0.47 lb-VOC/1,000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM₁₀ emissions from the fryer shall not exceed 7.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC emissions from the fryer shall not exceed 3.3 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM₁₀ emissions from the ambient air cooler shall not exceed 5.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. The high velocity air filter system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
11. The high velocity air filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Records of high velocity air filter system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] 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. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
14. The permittee shall surrender 351 metric tons of CO2 equivalent greenhouse gas (GHG) credits each year from a District-approved source, at least 60 days prior to the anniversary date of first operation (3/26/12), until the permittee supplies permanent GHG reductions, or complies with District established Best Performance Standard (BPS). All credits surrendered shall be demonstrated by the submittal of documentation, on or before the deadlines discussed above, that proves the retirement of the credits. [California Environmental Quality Act]

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-2-8

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #4 (TORTILLA CHIP) CONSISTING OF TWO STEAM-HEATED PRE-COOKER, TWO 5.48 MMBTU/HR CASA HERRERA MODEL MACH IV XWXL OVENS (DIRECT-FIRED, INDUCED DRAFT), ONE STEAM-HEATED COOKER AND A MECHANICAL SEASONER.

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. The ovens shall be fired primarily on natural gas fuel. LPG fuel shall only be used during periods of natural curtailment, and the use of LPG shall not exceed 384 hours in any calendar year. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
3. The combustion equipment shall be equipped with a mass or volumetric fuel flow meter capable of measuring the natural gas and LPG fuel usages. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from natural gas combustion in each oven shall not exceed any of the following emission limits: 0.1 lb-NOx/MMBtu, 0.0029 lb-SOx/MMBtu, 0.012 lb-PM10/MMBtu, 0.47 lb-CO/MMBtu, and 0.0053 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from LPG fuel combustion in each oven shall not exceed any of the following emission limits: 14 lb-NOx/1,000 gal, 0.45 lb-SOx/1,000 gal, 0.40 lb-PM10/1,000 gal, 42.535 lb-CO/1,000 gal, and 0.47 lb-VOC/1,000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions from the fryer shall not exceed 7.4 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC emissions from the fryer shall not exceed 3.2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-3-8

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #1 (POTATO CHIP) CONSISTING OF STEAM POWERED HEAT EXCHANGER SYSTEM PROVIDING HEAT TO A COOKER THAT IS SERVED BY AN OIL MIST ELIMINATOR, AND A MECHANICAL SEASONER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions from the cooker shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the cooker shall not exceed 45.4 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emissions from the cooker shall not exceed 1.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity and each process variable used in the respective calculations. All records shall be retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1919-4-6

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #2 (LIGHT POTATO CHIP): ONE COOKER (WITH A STEAM-POWERED HEAT EXCHANGER) SERVED BY AN OIL MIST ELIMINATOR, TWO POST COOKER CONDITIONING UNITS (ONE HEATED BY STEAM, ONE HEATED BY PERMIT EXEMPT 0.5 MMBTU/HR DRYER DIRECT-FIRED BURNER) AND A MECHANICAL SEASONER.

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. PM10 emissions from cooker and seasoner combined shall not exceed 8.9 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emissions from cooker shall not exceed 0.8 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-5-2

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

CORN RECEIVING, STORAGE AND HANDLING SYSTEM SERVED BY CARTER DAY DUST COLLECTION SYSTEM

PERMIT UNIT REQUIREMENTS

1. All equipment or systems shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. There shall be no visible emissions from this emission point. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All raw products stored in silos must be precleaned prior to receiving. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from the storage silos shall not exceed 1.05 lbs/hr or 7.4 lbs/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. All emissions from product transfer system shall be routed through a dust collection system. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All bulk grain products shall be received through a choke feed pit. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
10. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
11. The dust collection system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
13. 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] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-6-9

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

50.5 MMBTU/HR NEBRASKA MODEL NS-C-58 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. 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
2. Nitrogen oxide (NO_x) emissions shall not exceed 140 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
3. Emissions of sulfur compounds shall not exceed 200 lb per hour, calculated as SO₂. [District Rule 4301] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions from this unit shall not exceed 0.2% by volume, 2,000 ppmv, not a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and County Rule 407 (Stanislaus)] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized, and maintained. [40 CFR 60.48(c)(g)] Federally Enforceable Through Title V Permit
7. The unit shall only be fired on PUC-regulated natural gas as the primary fuel and LPG/propane as the backup fuel. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. Sulfur content of LPG/propane shall not exceed 15 grains per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The unit shall be fired on LPG/propane as backup fuel only during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
10. Emission rates from natural gas combustion shall not exceed any of the following limits: 7 ppmv NO_x @ 3% O₂, 0.00285 lb-SO_x/MMBtu, 0.0031 lb-PM₁₀/MMBtu, 100 ppmv CO @ 3% O₂, and 0.0063 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
11. Emission rates from LPG/propane combustion shall not exceed any of the following limits: 9 ppmv NO_x @ 3% O₂, 0.00285 lb-SO_x/MMBtu, 0.0031 lb-PM₁₀/MMBtu, 100 ppmv CO @ 3% O₂, and 0.0063 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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13. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
14. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
15. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
16. Fuel HHV shall be certified by a third party fuel supplier or determined by ASTM D 1826-88 or ASTM D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rules 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
17. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
18. Stack gas moisture content shall be determined using EPA Method 4. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
23. 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
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 days 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
25. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least 5 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. If the unit is fired on LPG/propane as backup fuel for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NO_x at least once during that year using an APCO approved portable NO_x analyzer. Monitoring for backup fuel NO_x emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on backup fuel solely to perform monitoring. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
29. Backup fuel NO_x emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least 5 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of: (1) the date and time of backup fuel NO_x measurements, (2) the measured backup fuel NO_x concentration (in ppmv or lb/MMBtu) corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. Permittee shall determine the sulfur content of the combusted natural gas annually or shall demonstrate that the combusted natural gas is provided from a PUC or FERC regulated source. [District Rule 4320] Federally Enforceable Through Title V Permit
32. Permittee shall determine sulfur content of combusted LPG/propane gas annually or shall use sulfur content information from material safety data sheet (MSDS) or similar documents supplied by the LPG/propane supplier to demonstrate compliance with the SO_x limit in this permit. The documents showing sulfur content in the LPG/propane fuel shall be kept on-site [District Rule 4320] Federally Enforceable Through Title V Permit
33. Records of daily and annual backup fuel consumption consisting of the date the boiler operated on LPG/propane as backup fuel and the amount of time the boiler was operated, in hours, on LPG/propane as backup fuel shall be maintained. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
34. Operator shall maintain monthly and annual records of the type, higher heating value, and quantity of fuel combusted by boilers at this location. [District Rules 2201 and 4351, and 40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
35. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 4320, and 4351, and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Stanislaus County Rule 407; SJVUAPCD Rule 4801 (Last Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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.

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 (Last Amended December 17, 1992) and 4301 (Last Amended December 17, 1992). A permit shield is granted from these requirements [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 1081 (Last Amended December 16, 1993), Stanislaus County Rule 108.1. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305 (Last Amended August 21, 2003), Sec. 4.2, 5.1.1, 5.1.2,, 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 (Last Amended August 21, 2003) Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-7-7

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #5 (SUN CHIP) CONSISTING OF A HAMMERMILL SERVED BY AN AAF TYPE-W ROTOCLONE EMISSIONS CONTROL SYSTEM, THREE HAMILTON MODEL SA300GAL PERMIT-EXEMPT PRE-COOKERS (STEAM HEATED), AND A HEAT & CONTROL MODEL E41 FRYER (STEAM HEATED) SERVED BY A HEAT AND CONTROL MODEL OME OIL MIST ELIMINATOR AND A SEASONER

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. There shall be no visible emissions from the exhaust of the oil mist eliminator (OME), except for uncombined water vapor. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The fryer shall not be operated unless the OME filter pad is in place. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The OME must be properly maintained and kept in good operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The PM10 emissions from the fryer shall not exceed 9.5 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The VOC emissions from the fryer shall not exceed 4.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The PM10 emissions from the hammer mill shall not exceed 0.1 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The PM10 emissions from the pneumatic transfer system shall not exceed 0.3 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
11. Records of oil mist eliminator maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-8-6

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

FRIED CHEESE PUFF LINE (LINE #7) CONSISTING OF PNEUMATIC CORN MEAL TRANSFER SYSTEM SERVED BY A SHICK TUBE-VEYOR CORPORATION MODEL STS-26 DUST COLLECTOR, TWO AMERICAN PROCESS MODEL DRB-18 BLENDERS, SIX R & D MACHINE MODEL FCP EXTRUDERS EACH SERVED BY A COMMON AMERICAN AIR FILTRATION W-TYPE ROTOCLONE, ONE FRITO-LAY EQUIPMENT MODEL #77 CHAFF TUMBLER, ONE HEAT AND CONTROL STEAM-HEATED FRYER SERVED BY AN OIL MIST ELIMINATOR, ONE FRITO-LAY EQUIPMENT SEASONER, CONVEYORS AND PACKAGING EQUIPMENT

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. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from the dust collector serving the pneumatic transfer system shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions from the extruding operations shall not exceed 1.9 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions from the fryer shall not exceed 6.5 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emissions from the fryer shall not exceed 4.1 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions from the pneumatic meal transfer system shall not exceed 0.2 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
11. Visible emissions from the dust collector shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
12. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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13. The dust collection system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained on site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-11-3

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

ONE HOLT STEAM HEATED STARCH DRYER SERVED BY A MAC EQUIPMENT INC MODEL # LSP 120LAST64,
STYLE III DUST COLLECTOR

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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. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest filter using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The material process rate of the starch dryer shall not exceed 1,500 pounds of wet starch per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The PM10 emissions shall not exceed 0.0026 pound per ton of wet starch processed. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained [District Rule 2201] Federally Enforceable Through Title V Permit
8. A daily record of the quantity of wet starch processed, in pounds, shall be kept. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
11. The dust collection system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
13. 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] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-12-2

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

PNEUMATIC TRANSFER OF CORN MEAL FROM RAIL CARS TO TWO PEABODY/SHICK 5,130 CUBIC FOOT STORAGE SILOS USING SHICK HIGH-VACUUM 58 HV24 DUST COLLECTOR (SERVING PNEUMATIC UNLOADING SYSTEM), AND A SHICK AUTOJET 58 AJ16 DUST COLLECTOR (SERVING THE STORAGE SILOS).

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. Visible emissions from each dust collector serving the corn meal receiving and storage operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
3. Replacement bags numbering at least 10% of the total number of bags in the dust collectors shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Each dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions from the corn meal receiving and storage operations shall not exceed 0.3 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The pressure differential, as indicated by the pressure differential gauge on each dust collector, shall stay between 0.5 to 6 inches of water column, when the corn meal receiving is in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Each dust collector's differential operating pressure shall be monitored and recorded on each day the corn meal is received. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Records of all maintenance of each dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain the calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-13-3

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

POTATO STARCH TRANSFER AND STORAGE OPERATION SERVED BY A REGENAIR MODEL R-8 PNEUMATIC BLOWER, A G.L. PRECISION MODEL #12PRF42-T PNEUMATIC RECEIVER/FILTER AND A 3,139 CUBIC FOOT CAPACITY WHEATLAND MODEL #1415-60 STORAGE SILO

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. Visible emissions from the receiver/filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest filter using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from the filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The PM10 emissions shall not exceed 0.026 pounds per ton of potato starch transferred to the silo. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The silo fill rate shall not exceed 36,000 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. A daily record of the quantity of potato starch transferred into the silo shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. Visible emissions from the receiver filter shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
11. The receiver/filter shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
12. The receiver/filter system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Records of receiver/filter system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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14. 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] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-14-2

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

POTATO STARCH LOADOUT OPERATION SERVED BY A SMOOT MODEL #117-29-CA PNEUMATIC PUMP AND A G.L. PRECISION MODEL #60GLP16-T BAGHOUSE

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. Visible emissions from the baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions shall not exceed 0.0022 pounds per ton of potato starch loaded out. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of potato starch loaded out shall not exceed 172,645 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. A daily record of the quantity of potato starch loaded out shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. Visible emissions from the baghouse shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
11. The baghouse shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
12. The baghouse shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
13. Records of baghouse system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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14. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-16-2

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

50.0 MMBTU/HR NEBRASKA MODEL NS-D-49 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. 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
2. Nitrogen oxide (NO_x) emissions shall not exceed 140 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
3. Emissions of sulfur compounds shall not exceed 200 lb per hour, calculated as SO₂. [District Rule 4301] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions from this unit shall not exceed 0.2% by volume, 2,000 ppmv, not a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and County Rule 407 (Stanislaus)] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized, and maintained. [40 CFR 60.48(c)(g)] Federally Enforceable Through Title V Permit
7. The unit shall only be fired on PUC-regulated natural gas as the primary fuel and LPG/propane as the backup fuel. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. Sulfur content of LPG/propane shall not exceed 15 grains per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The unit shall be fired on LPG/propane as backup fuel only during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
10. Emission rates from natural gas combustion shall not exceed any of the following limits: 7 ppmv NO_x @ 3% O₂, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 100 ppmv CO @ 3% O₂, and 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
11. Emission rates from LPG/propane combustion shall not exceed any of the following limits: 68 ppmv NO_x @ 3% O₂, 0.0166 lb-SO_x/MMBtu, 0.0066 lb-PM₁₀/MMBtu, 100 ppmv CO @ 3% O₂, and 0.0033 lb-VOC/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rules 4305, 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. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
14. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4320, and 4351] Federally Enforceable Through Title V Permit
15. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
16. Fuel HHV shall be certified by a third party fuel supplier or determined by ASTM D 1826-88 or ASTM D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rules 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
17. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
18. Stack gas moisture content shall be determined using EPA Method 4. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
23. 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
24. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 days 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
25. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] 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.

26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least 5 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. If the unit is fired on LPG/propane as backup fuel for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NO_x at least once during that year using an APCO approved portable NO_x analyzer. Monitoring for backup fuel NO_x emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on backup fuel solely to perform monitoring. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
29. Backup fuel NO_x emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least 5 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of: (1) the date and time of backup fuel NO_x measurements, (2) the measured backup fuel NO_x concentration (in ppmv or lb/MMBtu) corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. Permittee shall determine the sulfur content of the combusted natural gas annually or shall demonstrate that the combusted natural gas is provided from a PUC or FERC regulated source. [District Rule 4320] Federally Enforceable Through Title V Permit
32. Permittee shall determine sulfur content of combusted LPG/propane gas annually or shall use sulfur content information from material safety data sheet (MSDS) or similar documents supplied by the LPG/propane supplier to demonstrate compliance with the SO_x limit in this permit. The documents showing sulfur content in the LPG/propane fuel shall be kept on-site [District Rule 4320] Federally Enforceable Through Title V Permit
33. Records of daily and annual backup fuel consumption consisting of the date the boiler operated on LPG/propane as backup fuel and the amount of time the boiler was operated, in hours, on LPG/propane as backup fuel shall be maintained. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
34. Operator shall maintain monthly and annual records of the type, higher heating value, and quantity of fuel combusted by boilers at this location. [District Rules 2201 and 4351, and 40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
35. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 4320, and 4351, and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Stanislaus County Rule 407; SJVUAPCD Rule 4801 (Last Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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.

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 (Last Amended December 17, 1992) and 4301 (Last Amended December 17, 1992). A permit shield is granted from these requirements [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 1081 (Last Amended December 16, 1993), Stanislaus County Rule 108.1. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305 (Last Amended August 21, 2003), Sec. 4.2, 5.1.1, 5.1.2,, 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 (Last Amended August 21, 2003) Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

DRAFT

Attachment A

Detailed Facility Printout

Detailed Facility Report
For Facility=1919
Sorted by Facility Name and Permit Number

FRITO-LAY INC 600 GARNER RD MODESTO, CA 95357-0514	FAC # STATUS: TELEPHONE:	N 1919 A 2095445400	TYPE: TOXIC ID:	TitleV 10415	EXPIRE ON: AREA: INSP. DATE:	10/31/2012 8 / 05/13
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1919-1-6	6.4 MMBTU/HR TOTAL	3020-02 G	1	815.00	815.00	A	LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 3.2 MMBTU/HR OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER
N-1919-2-7	10.96 MMBTU/HR TOTAL	3020-02 G	1	815.00	815.00	A	LINE #4 (TORTILLA CHIP) CONSISTING OF TWO STEAM-HEATED PRE-COOKER, TWO 5.48 MMBTU/HR CASA HERRERA MODEL MACH IV XXXL OVENS (DIRECT-FIRED, INDUCED DRAFT), ONE STEAM-HEATED COOKER AND A MECHANICAL SEASONER
N-1919-3-7	267 BHP	3020-01 E	1	412.00	412.00	A	LINE #1 (POTATO CHIP) CONSISTING OF STEAM POWERED HEAT EXCHANGER SYSTEM PROVIDING HEAT TO A COOKER THAT IS SERVED BY AN OIL MIST ELIMINATOR, AND A MECHANICAL SEASONER
N-1919-4-5	456 BHP	3020-01 F	1	607.00	607.00	A	LINE #2 (LIGHT POTATO CHIP): ONE COOKER (WITH A STEAM-POWERED HEAT EXCHANGER) SERVED BY AN OIL MIST ELIMINATOR, TWO POST COOKER CONDITIONING UNITS (ONE HEATED BY STEAM, ONE HEATED BY PERMIT EXEMPT 0.5 MMBTU/HR DRYER DIRECT-FIRED BURNER) AND A MECHANICAL SEASONER
N-1919-5-0	20,000 GALLONS	3020-05 C	1	135.00	135.00	A	CORN RECEIVING, STORAGE AND HANDLING SYSTEM SERVED BY CARTER DAY DUST COLLECTION SYSTEM
N-1919-6-8	50.5 MMBTU/HR	3020-02 H	1	1,030.00	1,030.00	A	50.5 MMBTU/HR NEBRASKA MODEL NS-C-58 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM
N-1919-7-5	128 BHP	3020-01 D	1	314.00	314.00	A	LINE #5 (SUN CHIP) CONSISTING OF A HAMMERMILL SERVED BY AN AAF TYPE-W ROTOCLONE EMISSIONS CONTROL SYSTEM, THREE HAMILTON MODEL SA300GAL PERMIT-EXEMPT PRE-COOKERS (STEAM HEATED), AND A HEAT & CONTROL MODEL E41 FRYER (STEAM HEATED) SERVED BY A HEAT AND CONTROL MODEL OME OIL MIST ELIMINATOR AND A SEASONER
N-1919-8-5	477.5 BHP	3020-01 F	1	607.00	607.00	A	FRIED CHEESE PUFF LINE (LINE #7) CONSISTING OF PNEUMATIC CORN MEAL TRANSFER SYSTEM SERVED BY A SHICK TUBE-VEYOR CORPORATION MODEL STS-26 DUST COLLECTOR, TWO AMERICAN PROCESS MODEL DRB-18 BLENDERS, SIX R & D MACHINE MODEL FCP EXTRUDERS EACH SERVED BY A COMMON AMERICAN AIR FILTRATION W-TYPE ROTOCLONE, ONE FRITO-LAY EQUIPMENT MODEL 77 CHAFF TUMBLER, ONE HEAT AND CONTROL STEAM-HEATED FRYER SERVED BY AN OIL MIST ELIMINATOR, ONE FRITO-LAY EQUIPMENT SEASONER, CONVEYORS AND PACKAGING EQUIPMENT

Detailed Facility Report
For Facility=1919
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1919-9-0	1.2 MM BTU/HR	3020-02 D	1	314.00	314.00	D	LINE #6 (BAKED CHEESE PUFF): A BLENDER, A WENGER EXTRUDER VENTED THROUGH AN AMERICAN AIR FILTER ROTO-CLONE COLLECTOR (SERVES LINES #6 & #7), A WENGER OVEN (MDL #42001-000, 1.2 MMBTU/HR), A MECHANICAL SEASONER, VARIOUS CONVEYORS & PACKAGING EQUIPMENT. ***** DELETED ON 11/24/2002 PER APPLICANT'S REQUEST BECAUSE EQUIPMENT IS EXEMPT - NRP *****
N-1919-10-1	9 MMBTU/HR	3020-02 G	1	815.00	815.00	D	ONE (1) 9.0 MMBTU/HR KEMCO THERM EFFICIENT WATER HEATER (MODEL 100) (****DELETED PER APPLICANTS REQUEST - DB - 08/29/02****)
N-1919-11-2	121.75 BHP	3020-01 D	1	314.00	314.00	A	ONE HOLT STEAM HEATED STARCH DRYER SERVED BY A MAC EQUIPMENT INC MODEL LST 120LAST64, STYLE III DUST COLLECTOR
N-1919-12-1	45 BHP	3020-01 B	1	117.00	117.00	A	PNEUMATIC TRANSFER OF CORN MEAL FROM RAIL CARS TO TWO PEABODY/SHICK 5,130 CU FT STORAGE SILOS USING SHICK HIGH-VACUUM 58 HV24 DUST COLLECTOR (SERVING PNEUMATIC UNLOADING SYSTEM), AND A SHICK AUTOJET 58 AJ16 DUST COLLECTOR (SERVING THE STORAGE SILOS)
N-1919-13-2	23,840 GALLONS	3020-05 C	1	135.00	135.00	A	POTATO STARCH TRANSFER AND STORAGE OPERATION SERVED BY A REGENAIR MODEL R-6 PNEUMATIC BLOWER, A G.L. PRECISION MODEL 12PRF42-T PNEUMATIC RECEIVER/FILTER AND A 3,139 CU FT CAPACITY WHEATLAND MODEL 1415-60 STORAGE SILO
N-1919-14-1	29.5 BHP	3020-01 B	1	117.00	117.00	A	POTATO STARCH LOADOUT OPERATION SERVED BY A SMOOT MODEL 117-29-CA PNEUMATIC PUMP AND A G.L. PRECISION MODEL 60GLP16-T BAGHOUSE
N-1919-15-0	50,500 kbtu/hr	3020-01 H	1	1,030.00	1,030.00	D	50.5 MMBTU/HR ZURN MOBILE BOILER SERVED BY A LOW-NOX BURNER AND FLUE GAS RECIRCULATION (TEMPORARY REPLACEMENT EMISSIONS UNIT FOR N-1919-6).
N-1919-16-1	50.0 MMBTU/HR	3020-02 H	1	1,030.00	1,030.00	A	50.0 MMBTU/HR NEBRASKA MODEL NS-D-49 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

Number of Facilities Reported: 1

Attachment B

Exempt Equipment

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities:

Exemption Category	Rule 2020 Citation	✓
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.1	
Locomotives, airplanes, and watercraft used to transport passengers or freight.	4.4	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	6.1.1	✓
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	6.1.2	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	6.1.3	
Space heating equipment other than boilers.	6.1.4	✓
Cooling towers with a circulation rate less than 10,000 gal/min.	6.2	✓
Use of less than 2 gal/day of graphic arts materials.	6.3	
Equipment at retail establishments used to prepare food for human consumption.	6.4.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	6.4.2	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	6.5	
Containers used to store clean produced water.	6.6.1	
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762.	6.6.2	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762.	6.6.3	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature <150 F.	6.6.4	✓
Containers used to store unheated organic material with an initial boiling point ≥ 302 F.	6.6.5	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥0.9042.	6.6.6	
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251.	6.6.7	✓
Containers used to store refined lubricating oils.	6.6.8	✓
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	6.6.9 or 6.13	✓
Portable tanks used exclusively to store produced fluids for ≤ six months.	6.6.10	
Continued on Next Page		

Exemption Category	Rule 2020 Citation	✓
Mobile transport tanks on vehicles for delivery of VOCs.	6.6.11	
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point \geq 302 F or of fuel oil with specific gravity \geq 0.8251.	6.7.1.1	
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity \geq 0.8762.	6.7.1.2	
Equipment used exclusively for the transfer of refined lubricating oil.	6.7.2	
Equipment used to apply architectural coatings.	6.8.1	✓
Unheated, non-conveyorized degreasers $<$ 10 ft ² open area; using solvents with initial boiling point \geq 248 F; and $<$ 25 gal/yr evaporative losses.	6.9	
Brazing, soldering, or welding equipment.	6.10	✓
Equipment used to compress natural gas.	6.11	
Fugitive emissions sources associated with exempt equipment.	6.12	✓
Pits and Ponds as defined in Rule 1020.	6.15	
On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Emissions less than 2 lb/day from units not included above.	6.19	✓
Venting PUC quality natural gas for the sole purpose of pipeline and compressor repair and or maintenance	7.2	
Non-structural repairs & maintenance to permitted equipment.	7.3	✓
Detonation of explosives \leq 100 lb/day and 1,000 lb/day	7.4	

Attachment C

Existing SJVUAPCD Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-1-6

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 3.2 MMBTU/HR OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. The ovens shall be fired primarily on natural gas fuel. LPG fuel shall only be used during periods of natural curtailment, and the use of LPG shall not exceed 384 hours in a calendar year. [District Rule 2201]
5. The combustion equipment shall be equipped with a mass or volumetric fuel flow meter capable of measuring the natural gas and LPG fuel usages. [District Rule 2201]
6. Emissions from natural gas combustion in each oven shall not exceed any of the following emission limits: 0.1 lb-NO_x/MMBtu, 0.0029 lb-SO_x/MMBtu, 0.012 lb-PM₁₀/MMBtu, 0.47 lb-CO/MMBtu, and 0.0053 lb-VOC/MMBtu. [District Rule 2201]
7. Emissions from LPG fuel combustion in each oven shall not exceed any of the following emission limits: 14 lb-NO_x/1,000 gal, 0.45 lb-SO_x/1,000 gal, 0.40 lb-PM₁₀/1,000 gal, 42.535 lb-CO/1,000 gal, and 0.47 lb-VOC/1,000 gal. [District Rule 2201]
8. PM₁₀ emissions from the fryer shall not exceed 7.7 pounds in any one day. [District Rule 2201]
9. VOC emissions from the fryer shall not exceed 3.3 pounds in any one day. [District Rule 2201]
10. PM₁₀ emissions from the ambient air cooler shall not exceed 5.0 pounds in any one day. [District Rule 2201]
11. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]
12. The permittee shall surrender 351 metric tons of CO₂ equivalent greenhouse gas (GHG) credits each year from a District-approved source, at least 60 days prior to the anniversary date of first operation (3/26/12), until the permittee supplies permanent GHG reductions, or complies with District established Best Performance Standard (BPS). All credits surrendered shall be demonstrated by the submittal of documentation, on or before the deadlines discussed above, that proves the retirement of the credits. [California Environmental Quality Act]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-2-7

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #4 (TORTILLA CHIP) CONSISTING OF TWO STEAM-HEATED PRE-COOKER, TWO 5.48 MMBTU/HR CASA HERRERA MODEL MACH IV XWXL OVENS (DIRECT-FIRED, INDUCED DRAFT), ONE STEAM-HEATED COOKER AND A MECHANICAL SEASONER

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. The ovens shall be fired primarily on natural gas fuel. LPG fuel shall only be used during periods of natural curtailment, and the use of LPG shall not exceed 384 hours in any calendar year. [District Rule 2201]
5. The combustion equipment shall be equipped with a mass or volumetric fuel flow meter capable of measuring the natural gas and LPG fuel usages. [District Rule 2201]
6. Emissions from natural gas combustion in each oven shall not exceed any of the following emission limits: 0.1 lb-NO_x/MMBtu, 0.0029 lb-SO_x/MMBtu, 0.012 lb-PM₁₀/MMBtu, 0.47 lb-CO/MMBtu, and 0.0053 lb-VOC/MMBtu. [District Rule 2201]
7. Emissions from LPG fuel combustion in each oven shall not exceed any of the following emission limits: 14 lb-NO_x/1,000 gal, 0.45 lb-SO_x/1,000 gal, 0.40 lb-PM₁₀/1,000 gal, 42.535 lb-CO/1,000 gal, and 0.47 lb-VOC/1,000 gal. [District Rule 2201]
8. PM₁₀ emissions from the fryer shall not exceed 7.4 pounds in any one day. [District Rule 2201]
9. VOC emissions from the fryer shall not exceed 3.2 pounds in any one day. [District Rule 2201]
10. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

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

**San Joaquin Valley
Air Pollution Control District**

PERMIT UNIT: N-1919-3-7

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #1 (POTATO CHIP) CONSISTING OF STEAM POWERED HEAT EXCHANGER SYSTEM PROVIDING HEAT TO A COOKER THAT IS SERVED BY AN OIL MIST ELIMINATOR, AND A MECHANICAL SEASONER

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions from the cooker shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. PM10 emissions from the cooker shall not exceed 45.4 pounds in any one day. [District Rule 2201]
5. VOC emissions from the cooker shall not exceed 1.7 pounds in any one day. [District Rule 2201]
6. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity and each process variable used in the respective calculations. All records shall be retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-4-5

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #2 (LIGHT POTATO CHIP): ONE COOKER (WITH A STEAM-POWERED HEAT EXCHANGER) SERVED BY AN OIL MIST ELIMINATOR, TWO POST COOKER CONDITIONING UNITS (ONE HEATED BY STEAM, ONE HEATED BY PERMIT EXEMPT 0.5 MMBTU/HR DRYER DIRECT-FIRED BURNER) AND A MECHANICAL SEASONER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. PM10 emissions from cooker and seasoner combined shall not exceed 8.9 pounds in any one day. [District Rule 2201]
5. VOC emissions from cooker shall not exceed 0.8 pounds in any one day. [District Rule 2201]
6. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-5-0

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

CORN RECEIVING, STORAGE AND HANDLING SYSTEM SERVED BY CARTER DAY DUST COLLECTION SYSTEM

PERMIT UNIT REQUIREMENTS

1. All equipment or systems shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. There shall be no visible emissions from this emission point. [District NSR Rule]
6. All raw products stored in silos must be precleaned prior to receiving. [District NSR Rule]
7. PM10 emissions from the storage silos shall not exceed 1.05 lbs/hr or 7.4 lbs/day. [District NSR Rule]
8. All emissions from product transfer system shall be routed through a dust collection system. [District NSR Rule]
9. All bulk grain products shall be received through a choke feed pit. [District NSR Rule]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-6-8

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

50.5 MMBTU/HR NEBRASKA MODEL NS-C-58 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. The unit shall only be fired on PUC-regulated natural gas as the primary fuel and LPG/propane as the backup fuel. [District Rule 2201]
6. Sulfur content of LPG/propane shall not exceed 15 grains per 100 scf. [District Rule 2201]
7. The unit shall be fired on LPG/propane as backup fuel only during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, and 4320]
8. If the unit is fired on LPG/propane as backup fuel for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NOx at least once during that year using an APCO approved portable NOx analyzer. Monitoring for backup fuel NOx emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on backup fuel solely to perform monitoring. [District Rules 4305, 4306, and 4320]
9. Backup fuel NOx emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least 5 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320]
10. The permittee shall maintain records of: (1) the date and time of backup fuel NOx measurements, (2) the measured backup fuel NOx concentration (in ppmv or lb/MMBtu) corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]
11. Emission rates from natural gas combustion shall not exceed any of the following limits: 7 ppmv NOx @ 3% O₂, 0.00285 lb-SO_x/MMBtu, 0.0031 lb-PM10/MMBtu, 100 ppmv CO @ 3% O₂, and 0.0063 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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12. Emission rates from LPG/propane combustion shall not exceed any of the following limits: 9 ppmv NO_x @ 3% O₂, 0.00285 lb-SO_x/MMBtu, 0.0031 lb-PM₁₀/MMBtu, 100 ppmv CO @ 3% O₂, and 0.0063 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320]
13. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320]
14. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320]
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least 5 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320]
16. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320]
18. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rules 4305, 4306, and 4320]
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320]
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
22. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320]
23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320]
25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320]
26. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
27. Records of daily and annual backup fuel consumption consisting of the date the boiler operated on LPG/propane as backup fuel and the amount of time the boiler was operated, in hours, on LPG/propane as backup fuel shall be maintained. [District Rules 2201, 4305, 4306, and 4320]
28. Operator shall maintain monthly records of the type and quantity of fuel combusted by boilers at this location. [District Rules 2201 and 40 CFR 60.48c(g)]
29. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-7-5

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

LINE #5 (SUN CHIP) CONSISTING OF A HAMMERMILL SERVED BY AN AAF TYPE-W ROTOCLONE EMISSIONS CONTROL SYSTEM, THREE HAMILTON MODEL SA300GAL PERMIT-EXEMPT PRE-COOKERS (STEAM HEATED), AND A HEAT & CONTROL MODEL E41 FRYER (STEAM HEATED) SERVED BY A HEAT AND CONTROL MODEL OME OIL MIST ELIMINATOR AND A SEASONER

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. There shall be no visible emissions from the exhaust of the oil mist eliminator (OME), except for uncombined water vapor. [District Rule 2201]
5. The fryer shall not be operated unless the OME filter pad is in place. [District Rule 2201]
6. The OME must be properly maintained and kept in good operating condition at all times. [District Rule 2201]
7. The PM10 emissions from the fryer shall not exceed 9.5 pounds during any one day. [District Rule 2201]
8. The VOC emissions from the fryer shall not exceed 4.4 pounds during any one day. [District Rule 2201]
9. The PM10 emissions from the hammer mill shall not exceed 0.1 pounds during any one day. [District Rule 2201]
10. The PM10 emissions from the pneumatic transfer system shall not exceed 0.3 pounds during any one day. [District Rule 2201]
11. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-8-5

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

FRIED CHEESE PUFF LINE (LINE #7) CONSISTING OF PNEUMATIC CORN MEAL TRANSFER SYSTEM SERVED BY A SHICK TUBE-VEYOR CORPORATION MODEL STS-26 DUST COLLECTOR, TWO AMERICAN PROCESS MODEL DRB-18 BLENDERS, SIX R & D MACHINE MODEL FCP EXTRUDERS EACH SERVED BY A COMMON AMERICAN AIR FILTRATION W-TYPE ROTOCLONE, ONE FRITO-LAY EQUIPMENT MODEL 77 CHAFF TUMBLER, ONE HEAT AND CONTROL STEAM-HEATED FRYER SERVED BY AN OIL MIST ELIMINATOR, ONE FRITO-LAY EQUIPMENT SEASONER, CONVEYORS AND PACKAGING EQUIPMENT

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
5. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
6. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
7. Visible emissions from the dust collector serving the pneumatic transfer system shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
8. PM10 emissions from the extruding operations shall not exceed 1.9 pounds during any one day. [District Rule 2201]
9. PM10 emissions from the fryer shall not exceed 6.5 pounds during any one day. [District Rule 2201]
10. VOC emissions from the fryer shall not exceed 4.1 pounds during any one day. [District Rule 2201]
11. PM10 emissions from the pneumatic meal transfer system shall not exceed 0.2 pounds during any one day. [District Rule 2201]
12. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained on site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-11-2

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

ONE HOLT STEAM HEATED STARCH DRYER SERVED BY A MAC EQUIPMENT INC MODEL LST 120LAST64, STYLE III DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
5. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
6. Replacement bags numbering at least 10% of the total number of bags in the largest filter using each type of bag shall be maintained on the premises. [District Rule 2201]
7. The material process rate of the starch dryer shall not exceed 1,500 pounds of wet starch per hour. [District Rule 2201]
8. The PM10 emissions shall not exceed 0.0026 pound per ton of wet starch processed. [District Rule 2201]
9. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained [District Rule 2201]
10. A daily record of the quantity of wet starch processed, in pounds, shall be kept. [District Rule 1070]
11. 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]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-12-1

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

PNEUMATIC TRANSFER OF CORN MEAL FROM RAIL CARS TO TWO PEABODY/SHICK 5,130 CU FT STORAGE SILOS USING SHICK HIGH-VACUUM 58 HV24 DUST COLLECTOR (SERVING PNEUMATIC UNLOADING SYSTEM), AND A SHICK AUTOJET 58 AJ16 DUST COLLECTOR (SERVING THE STORAGE SILOS)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Visible emissions from each dust collector serving the corn meal receiving and storage operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
5. Replacement bags numbering at least 10% of the total number of bags in the dust collectors shall be maintained on the premises. [District Rule 2201]
6. Material removed from the dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
7. Each dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. PM10 emissions from the corn meal receiving and storage operations shall not exceed 0.3 pounds in any one day. [District Rule 2201]
9. Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
10. The pressure differential, as indicated by the pressure differential gauge on each dust collector, shall stay between 0.5 to 6 inches of water column, when the corn meal receiving is in operation. [District Rule 2201]
11. Each dust collector's differential operating pressure shall be monitored and recorded on each day the corn meal is received. [District Rule 2201]
12. Records of all maintenance of each dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]
13. The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain the calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-13-2

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

POTATO STARCH TRANSFER AND STORAGE OPERATION SERVED BY A REGENAIR MODEL R-6 PNEUMATIC BLOWER, A G.L. PRECISION MODEL 12PRF42-T PNEUMATIC RECEIVER/FILTER AND A 3,139 CU FT CAPACITY WHEATLAND MODEL 1415-60 STORAGE SILO

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Visible emissions from the receiver/filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
5. Replacement bags numbering at least 10% of the total number of bags in the largest filter using each type of bag shall be maintained on the premises. [District Rule 2201]
6. Material removed from the filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
7. The filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. The PM10 emissions shall not exceed 0.026 pounds per ton of potato starch transferred to the silo. [District Rule 2201]
9. The silo fill rate shall not exceed 36,000 pounds during any one day. [District Rule 2201]
10. A daily record of the quantity of potato starch transferred into the silo shall be kept. [District Rule 2201]
11. 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]

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-14-1

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

POTATO STARCH LOADOUT OPERATION SERVED BY A SMOOT MODEL 117-29-CA PNEUMATIC PUMP AND A G.L. PRECISION MODEL 60GLP16-T BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Visible emissions from the baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
5. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
6. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
7. The filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. PM10 emissions shall not exceed 0.0022 pounds per ton of potato starch loaded out. [District Rule 2201]
9. The quantity of potato starch loaded out shall not exceed 172,645 pounds during any one day. [District Rule 2201]
10. A daily record of the quantity of potato starch loaded out shall be kept. [District Rule 2201]
11. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 1070]

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-16-1

EXPIRATION DATE: 10/31/2012

EQUIPMENT DESCRIPTION:

50.0 MMBTU/HR NEBRASKA MODEL NS-D-49 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. The unit shall only be fired on PUC-regulated natural gas as the primary fuel and LPG/propane as the backup fuel. [District Rule 2201]
6. Sulfur content of LPG/propane shall not exceed 15 grains per 100 scf. [District Rule 2201]
7. The unit shall be fired on LPG/propane as backup fuel only during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, and 4320]
8. If the unit is fired on LPG/propane as backup fuel for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NOx at least once during that year using an APCO approved portable NOx analyzer. Monitoring for backup fuel NOx emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on backup fuel solely to perform monitoring. [District Rules 4305, 4306, and 4320]
9. Backup fuel NOx emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least 5 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320]
10. The permittee shall maintain records of: (1) the date and time of backup fuel NOx measurements, (2) the measured backup fuel NOx concentration (in ppmv or lb/MMBtu) corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]
11. Emission rates from natural gas combustion shall not exceed any of the following limits: 7 ppmv NOx @ 3% O2, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmv CO @ 3% O2, and 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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12. Emission rates from LPG/propane combustion shall not exceed any of the following limits: 68 ppmv NO_x @ 3% O₂, 0.0166 lb-SO_x/MMBtu, 0.0066 lb-PM₁₀/MMBtu, 100 ppmv CO @ 3% O₂, and 0.0033 lb-VOC/MMBtu. [District Rule 2201, 4305, 4306, and 4320]
13. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320]
14. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320]
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least 5 readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320]
16. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320]
18. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rules 4305, 4306, and 4320]
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320]
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
22. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320]
23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320]
25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320]
26. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
27. Records of daily and annual backup fuel consumption consisting of the date the boiler operated on LPG/propane as backup fuel and the amount of time the boiler was operated, in hours, on LPG/propane as backup fuel shall be maintained. [District Rules 2201, 4305, 4306, and 4320]
28. Operator shall maintain monthly records of the type and quantity of fuel combusted by boilers at this location. [District Rules 2201 and 40 CFR 60.48c(g)]
29. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

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Attachment D

Hazardous Air Pollutant Calculations

Hazardous Air Pollutant (HAP) Emission Calculations

HAP emission calculations are necessary to determine whether the facility is a Major Source of HAPs or an Area Source of HAPs.

- a. LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 3.2 MMBTU/HR OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER

HAP emissions are expected from the combustion of natural gas and LPG/Propane from this unit. Since the unit processes food for human consumption, no HAP emissions are expected from any of the other processes associated with this permit. The following emission factors are from ARB's CATEF emission factor database for natural gas combustion. Since the units primarily fire on natural gas, these emission factors are appropriate.

CAS	Substance	Max Emission Factor
75-07-0	Acetaldehyde	0.0000147 lb/MMBtu
100-52-7	Benzaldehyde	0.0000272 lb/MMBtu
71-43-2	Benzene	0.0000087 lb/MMBtu
50-00-0	Formaldehyde	0.000672 lb/MMBtu

The permit does not contain any limitations on annual fuel usage, thus:

Annual Heat Input = 2 ovens x 3.2 MMBtu/hr x 8760 hr/year
 Annual Heat Input = 56,064 MMBtu/year

The HAP emissions will be calculated using the annual heat input and the above emission factors.

$$PE_{HAP} = \text{Annual Heat Input (MMBtu/year)} \times \text{Max Emission Factor (lb/MMBtu)}$$

CAS	Substance	Annual Heat Input	Max Emission Factor	PE _{HAP}
75-07-0	Acetaldehyde	56,064 MMBtu/year	0.0000147 lb/MMBtu	0.8 lb/year
100-52-7	Benzaldehyde	56,064 MMBtu/year	0.0000272 lb/MMBtu	1.5 lb/year
71-43-2	Benzene	56,064 MMBtu/year	0.0000087 lb/MMBtu	0.5 lb/year
50-00-0	Formaldehyde	56,064 MMBtu/year	0.000672 lb/MMBtu	37.7 lb/year

- b. LINE #4 (TORTILLA CHIP) CONSISTING OF TWO STEAM-HEATED PRE-COOKER, TWO 5.48 MMBTU/HR CASA HERRERA MODEL MACH IV XWXL OVENS (DIRECT-FIRED, INDUCED DRAFT), ONE STEAM-HEATED COOKER AND A MECHANICAL SEASONER**

HAP emissions are expected from the combustion of natural gas and LPG/Propane from this unit. Since the unit processes food for human consumption, no HAP emissions are expected from any of the other processes associated with this permit. The following emission factors are from ARB's CATEF emission factor database for natural gas combustion. Since the units primarily fire on natural gas, these emission factors are appropriate.

CAS	Substance	Max Emission Factor
75-07-0	Acetaldehyde	0.0000147 lb/MMBtu
100-52-7	Benzaldehyde	0.0000272 lb/MMBtu
71-43-2	Benzene	0.0000087 lb/MMBtu
50-00-0	Formaldehyde	0.000672 lb/MMBtu

The permit does not contain any limitations on annual fuel usage, thus:

Annual Heat Input = 2 ovens x 5.48 MMBtu/hr x 8760 hr/year
 Annual Heat Input = 96,010 MMBtu/year

The HAP emissions will be calculated using the annual heat input and the above emission factors.

$PE_{HAP} = \text{Annual Heat Input (MMBtu/year)} \times \text{Max Emission Factor (lb/MMBtu)}$

CAS	Substance	Annual Heat Input	Max Emission Factor	PE _{HAP}
75-07-0	Acetaldehyde	96,010 MMBtu/year	0.0000147 lb/MMBtu	1.4 lb/year
100-52-7	Benzaldehyde	96,010 MMBtu/year	0.0000272 lb/MMBtu	2.6 lb/year
71-43-2	Benzene	96,010 MMBtu/year	0.0000087 lb/MMBtu	0.8 lb/year
50-00-0	Formaldehyde	96,010 MMBtu/year	0.000672 lb/MMBtu	64.5 lb/year

- c. LINE #1 (POTATO CHIP) CONSISTING OF STEAM POWERED HEAT EXCHANGER SYSTEM PROVIDING HEAT TO A COOKER THAT IS SERVED BY AN OIL MIST ELIMINATOR, AND A MECHANICAL SEASONER**

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

d. LINE #2 (LIGHT POTATO CHIP): ONE COOKER (WITH A STEAM-POWERED HEAT EXCHANGER) SERVED BY AN OIL MIST ELIMINATOR, TWO POST COOKER CONDITIONING UNITS (ONE HEATED BY STEAM, ONE HEATED BY PERMIT EXEMPT 0.5 MMBTU/HR DRYER DIRECT-FIRED BURNER) AND A MECHANICAL SEASONER

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

e. CORN RECEIVING, STORAGE AND HANDLING SYSTEM SERVED BY CARTER DAY DUST COLLECTION SYSTEM

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

f. 50.5 MMBTU/HR NEBRASKA MODEL NS-C-58 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

HAP emissions are expected from the combustion of natural gas and LPG/Propane from this unit. The following emission factors are from ARB's CATEF emission factor database for natural gas combustion. Since the unit is primarily fired on natural gas, these emission factors are appropriate.

CAS	Substance	Max Emission Factor
75-07-0	Acetaldehyde	0.0000147 lb/MMBtu
100-52-7	Benzaldehyde	0.0000272 lb/MMBtu
71-43-2	Benzene	0.0000087 lb/MMBtu
50-00-0	Formaldehyde	0.000672 lb/MMBtu

The permit does not contain any limitations on annual fuel usage, thus:

Annual Heat Input = 50.5 MMBtu/hr x 8760 hr/year

Annual Heat Input = 442,380 MMBtu/year

The HAP emissions will be calculated using the annual heat input and the above emission factors.

$$PE_{HAP} = \text{Annual Heat Input (MMBtu/year)} \times \text{Max Emission Factor (lb/MMBtu)}$$

CAS	Substance	Annual Heat Input	Max Emission Factor	PE _{HAP}
75-07-0	Acetaldehyde	442,380 MMBtu/year	0.0000147 lb/MMBtu	6.5 lb/year
100-52-7	Benzaldehyde	442,380 MMBtu/year	0.0000272 lb/MMBtu	12.0 lb/year
71-43-2	Benzene	442,380 MMBtu/year	0.0000087 lb/MMBtu	3.8 lb/year
50-00-0	Formaldehyde	442,380 MMBtu/year	0.000672 lb/MMBtu	297.3 lb/year

- g. LINE #5 (SUN CHIP) CONSISTING OF A HAMMERMILL SERVED BY AN AAF TYPE-W ROTOCLONE EMISSIONS CONTROL SYSTEM, THREE HAMILTON MODEL SA300GAL PERMIT-EXEMPT PRE-COOKERS (STEAM HEATED), AND A HEAT & CONTROL MODEL E41 FRYER (STEAM HEATED) SERVED BY A HEAT AND CONTROL MODEL OME OIL MIST ELIMINATOR AND A SEASONER

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

- h. FRIED CHEESE PUFF LINE (LINE #7) CONSISTING OF PNEUMATIC CORN MEAL TRANSFER SYSTEM SERVED BY A SHICK TUBE-VEYOR CORPORATION MODEL STS-26 DUST COLLECTOR, TWO AMERICAN PROCESS MODEL DRB-18 BLENDERS, SIX R & D MACHINE MODEL FCP EXTRUDERS EACH SERVED BY A COMMON AMERICAN AIR FILTRATION W-TYPE ROTOCLONE, ONE FRITO-LAY EQUIPMENT MODEL 77 CHAFF TUMBLER, ONE HEAT AND CONTROL STEAM-HEATED FRYER SERVED BY AN OIL MIST ELIMINATOR, ONE FRITO-LAY EQUIPMENT SEASONER, CONVEYORS AND PACKAGING EQUIPMENT

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

- i. ONE HOLT STEAM HEATED STARCH DRYER SERVED BY A MAC EQUIPMENT INC MODEL LST 120LAST64, STYLE III DUST COLLECTOR

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

- j. PNEUMATIC TRANSFER OF CORN MEAL FROM RAIL CARS TO TWO PEABODY/SHICK 5,130 CU FT STORAGE SILOS USING SHICK HIGH-VACUUM 58 HV24 DUST COLLECTOR (SERVING PNEUMATIC UNLOADING SYSTEM), AND A SHICK AUTOJET 58 AJ16 DUST COLLECTOR (SERVING THE STORAGE SILOS)

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

- k. POTATO STARCH TRANSFER AND STORAGE OPERATION SERVED BY A REGENAIR MODEL R-6 PNEUMATIC BLOWER, A G.L. PRECISION MODEL 12PRF42-T PNEUMATIC RECEIVER/FILTER AND A 3,139 CU FT CAPACITY WHEATLAND MODEL 1415-60 STORAGE SILO

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

- l. POTATO STARCH LOADOUT OPERATION SERVED BY A SMOOT MODEL 117-29-CA PNEUMATIC PUMP AND A G.L. PRECISION MODEL 60GLP16-T BAGHOUSE

No HAP emissions are expected from this unit, since the unit processes food that is used for human consumption.

- m. 50.0 MMBTU/HR NEBRASKA MODEL NS-D-49 BOILER WITH A NATCOM MODEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

HAP emissions are expected from the combustion of natural gas and LPG/Propane from this unit. The following emission factors are from ARB's CATEF emission factor database for natural gas combustion. Since the unit is primarily fired on natural gas, these emission factors are appropriate.

CAS	Substance	Max Emission Factor
75-07-0	Acetaldehyde	0.0000147 lb/MMBtu
100-52-7	Benzaldehyde	0.0000272 lb/MMBtu
71-43-2	Benzene	0.0000087 lb/MMBtu
50-00-0	Formaldehyde	0.000672 lb/MMBtu

The permit does not contain any limitations on annual fuel usage, thus:

Annual Heat Input = 50 MMBtu/hr x 8760 hr/year

Annual Heat Input = 438,000 MMBtu/year

The HAP emissions will be calculated using the annual heat input and the above emission factors.

$$PE_{HAP} = \text{Annual Heat Input (MMBtu/year)} \times \text{Max Emission Factor (lb/MMBtu)}$$

CAS	Substance	Annual Heat Input	Max Emission Factor	PE _{HAP}
75-07-0	Acetaldehyde	438,000 MMBtu/year	0.0000147 lb/MMBtu	6.4 lb/year
100-52-7	Benzaldehyde	438,000 MMBtu/year	0.0000272 lb/MMBtu	11.9 lb/year
71-43-2	Benzene	438,000 MMBtu/year	0.0000087 lb/MMBtu	3.8 lb/year
50-00-0	Formaldehyde	438,000 MMBtu/year	0.000672 lb/MMBtu	294.3 lb/year

Total Facility HAP Emissions

The following table shows the calculated total facility HAP emissions.

HAP	PE (lb/year)
Acetaldehyde	15.1
Benzaldehyde	28.0
Benzene	8.9
Formaldehyde	693.8
Total	745.8

HAP Major Source Determination

The trigger threshold for being considered a Major Source of HAP emissions is 10 tons of any one HAP or 25 tons of total HAP emissions. The HAP emissions for this facility are much less than the Major Source HAP thresholds. Therefore, this facility is an Area Source of HAP emissions, and is not a Major Source of HAP emissions.