

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Permit Renewal

**Facility Name:** Frito-Lay North America, Inc.  
**Facility ID:** 346  
**SIC Code:** 2096  
**Equipment Location:** 9536 Archibald Avenue  
Rancho Cucamonga, CA 91730

**Application #(s):** 543116  
**Application Submittal Date(s):** 09/28/2012

**Permit Revision #:** Renewal  
**Revision Date:**  
**Permit Section(s) Affected:** All

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#### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO<sub>2</sub>, SO<sub>2</sub>, CO and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme non-attainment.

A Title V permit is proposed to be issued to cover the operations of Frito-Lay North America Inc. Rancho Cucamonga, CA 91730. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

This is an existing facility, applying for a renewal to their Title V Permit. The facility produces corn chips, tortilla chips and similar snacks. The facility is operating material storage/handling equipment, boilers, baking ovens and fryers. Emissions are controlled with cyclones, dust collectors, one scrubber, integral fryer/afterburners, and a regenerative thermal oxidizer.

## **3. Construction and Permitting History**

The facility has been in constant operation since 2001. Numerous permits to construct and permits to operate have been issued to the facility since February 2001. An initial Title V permit was issued to the facility on February 22, 2001. A Title V Renewal Permit was issued on March 25, 2008.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS or NESHAP requirements.

## **5. Monitoring and Operational Requirements**

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP; Combustion Sources (July 2001). Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility. The facility is operating a Regenerative Thermal Oxidizer to control emissions from deep fat fryer (D65). The pre-control emissions from this unit are under the major source threshold for PM10 and VOC. Therefore, the CAM requirements do not apply.

## 6. Permit Features

### Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). The initial Title V permit for this facility has already included a permit shield condition (Cond. M333.1) for a glove-box type abrasive blasting equipment (Device E83) since AQMD Rule 1140 (d) does not apply to this type of equipment.

### Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

## 7. Summary of Emissions and Health Risks

**Criteria Pollutant Emissions (tons/year)  
Annual Reported Emissions for Reporting Period 2011**

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	2.678
NOX	Nitrogen Oxides	10.246
ROG	Reactive Organic Gases	2.692
SOX	Sulfur Oxides	0.046
TSP	Total Suspended Particulates	16.448

**Toxic Air Contaminants Emissions (TAC, lbs/yr)  
Annual Reported Emissions for Reporting Period 2011**

Pollutant ID	Pollutant Description	Annual Emissions
106990	1,3-Butadiene	0.001
7664417	Ammonia	2735.45
1332214	Asbestos	1.455
71432	Benzene	1.212
50000	Formaldehyde	2.585
91203	Naphthalene	0.045
1151	PAHs, total	0.015

**Health Risk from Toxic Air Contaminants**

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The facility was determined to be exempt from AB2588 requirements.

**8. Compliance History**

As noted, the facility has been in constant operation with a Title V Permit since 2001. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaint filed and one Notice to Comply issued. The Notice to Comply was due to late submittal of emissions reporting. This issue has been resolved. Abatement Order (Case No. 5141-5) is resolved and final permits to operate were issued 11/30/12.

**9. Compliance Certification**

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.