



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



DEC 22 2011

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # S-1113629**

Dear Mr. Rios:

The Air Pollution Control Officer has issued an Authority to Construct (S-525-42-4) with a Certificate of Conformity to Land O' Lakes, Inc.. The project is to modify permit S-525-42 for an existing 180 MMBtu/hr natural gas-fired boiler by detailing the specific requirements of its Predictive Emission Monitoring System (PEMS) and replacing its alternate monitoring scheme conditions.

Enclosed are copies of the Authority to Construct. The application and proposal were sent to US EPA Region IX on December 5, 2011. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,


David Warner
Director of Permit Services

Enclosures
har

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



DEC 22 2011

Mr. Douglas Finley
Land O' Lakes, Inc.
400 South "M" St
Tulare, CA 93274

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # S-1113629**

Dear Mr. Finley:

The Air Pollution Control Officer has issued an Authority to Construct (S-525-42-4) with a Certificate of Conformity to Land O' Lakes, Inc.. The project is to modify permit S-525-42 for an existing 180 MMBtu/hr natural gas-fired boiler by detailing the specific requirements of its Predictive Emission Monitoring System (PEMS) and replacing its alternate monitoring scheme conditions.

Enclosed is the Authority to Construct and invoice. The application and proposal were sent to US EPA Region IX on December 5, 2011. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,


David Warner
Director of Permit Services

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AUTHORITY TO CONSTRUCT

PERMIT NO: S-525-42-4

ISSUANCE DATE: 12/19/2011

LEGAL OWNER OR OPERATOR: LAND O' LAKES, INC.
MAILING ADDRESS: 400 SOUTH M STREET
TULARE, CA 93274

LOCATION: 400 SOUTH "M" ST
TULARE, CA 93274

EQUIPMENT DESCRIPTION:

MODIFICATION OF 180 MMBTU/HR UNION IRON WORKS NATURAL GAS FIRED BOILER WITH RMB LOW NOX BURNER AND FLUE GAS RECIRCULATION: SPECIFY THE PREDICTIVE EMISSION MONITORING SYSTEM (PEMS) REQUIREMENTS AND REPLACE THE ALTERNATE MONITORING SCHEME CONDITIONS

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Permittee shall comply with all applicable NSPS requirements, including monitoring, notification and reporting requirements as described in 40 CFR 60 Subparts A and Db. [District Rule 4001] Federally Enforceable Through Title V Permit
3. 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
4. Only PUC quality natural gas shall be combusted in this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd-NOx @ 3% O2, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmvd-CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. Flue gas recirculation system shall be operational at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-525-42-4 Dec: 19 2011 9:31AM - RAMIREZH : Joint Inspection Required with RAMIREZH

7. 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] Federally Enforceable Through Title V Permit
8. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (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 twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. At all times the PEMS must be operated in accordance with the requirements contained in EPA Performance Specification 16 for Predictive Emissions Monitoring Systems and Amendments to Testing and Monitoring Provisions. See 56 Fed. Reg. 12575 (March 25, 2009). [District Rule 1080] Federally Enforceable Through Title V Permit
11. All records related to the operation of the PEMS that are required by NSPS Subpart Db and EPA Performance Specification 16 must be kept in a form suitable for inspection for a period of at least five (5) years. [District Rule 1080] Federally Enforceable Through Title V Permit
12. The sensor evaluation system must check the integrity of each PEMS input at least daily. [District Rule 1080] Federally Enforceable Through Title V Permit
13. The PEMS data is considered biased and must be adjusted if the arithmetic mean (\bar{d}) is greater than the absolute value of the confidence coefficient (cc) in Equations 16.1 and 16.3 of EPA Performance Specification 16. In such cases, a bias factor must be used to correct the PEMS data. [District Rule 1080] Federally Enforceable Through Title V Permit
14. Permittee shall perform a RAA consisting of at least three 30-minute portable analyzer or RM determinations each quarter a RATA is not performed as specified in Section 9.3 of EPA Performance Specification 16. The average of the 3 portable analyzer or RM determinations must not differ from the simultaneous PEMS average value by more than 10 percent of the analyzer or RM value or the test is failed. [District Rule 1080] Federally Enforceable Through Title V Permit
15. If a PEMS passes all quarterly RAAs in the first year and also passes the subsequent yearly RATA in the second year, the permittee may elect to perform a single mid-year RAA in the second year in place of the quarterly RAAs as specified in Section 9.3 of EPA Performance Specification 16. This option may be repeated, but only until the PEMS fails either a mid-year RAA or a yearly RATA. When such a failure occurs, you must resume quarterly RAAs in the quarter following the failure and continue conducting quarterly RAAs until the PEMS successfully passes both a year of quarterly RAAs and a subsequent RATA. [District Rule 1080] Federally Enforceable Through Title V Permit
16. The calculated F-value (as specified in Section 13.3 of EPA Performance Specification 16) shall not exceed the critical F-value at the 95-percent confidence level for the PEMS to be acceptable. [District Rule 1080] Federally Enforceable Through Title V Permit
17. The calculated r-value (as calculated in EPA Performance Specification 16) must be greater than or equal to 0.8 for the PEMS correlation to be acceptable. [District Rule 1080] Federally Enforceable Through Title V Permit
18. The PEMS relative accuracy (RA) must not exceed 10 percent if the PEMS measurements are greater than 100 ppm or 0.2 lb/MMBtu. The RA must not exceed 20 percent if the PEMS measurements are between 100 ppm (or 0.2 lb/MMBtu) and 10 ppm (or 0.05 lb/MMBtu). For measurements below 10 ppm, the absolute mean difference between the PEMS measurements and the RM measurements must not exceed 2 ppm. [District Rule 1080] Federally Enforceable Through Title V Permit
19. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. 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
22. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
23. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rules 2520, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
24. 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] Federally Enforceable Through Title V Permit
25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. Operator shall monitor and record for each unit the hhv and cumulative annual use of fuel. [District Rules 4320, 4351, and 2520] Federally Enforceable Through Title V Permit
30. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520] Federally Enforceable Through Title V Permit
31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 405 (Madera), Rule 408 (Fresno), Rule 408.2 (Merced) and 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin); Rule 402(Madera) and 404 (all seven remaining counties in the San Joaquin Valley); SJVUAPCD Rule 4301. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
32. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 405 (Madera), 408 and 409 (Kern), and 408 (all six remaining counties in the San Joaquin Valley); Rule 404 (Madera) 406 (Fresno), and 407 (all six remaining counties in the San Joaquin Valley); SJVUAPCD Rule 4801. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
33. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201, 4301, 4305, 4306, and 4351. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
34. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera). [District Rule 2520] Federally Enforceable Through Title V Permit
35. The requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520] Federally Enforceable Through Title V Permit
36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit