



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



DEC 30 2014

Mr. Rick Sousa  
Ingomar Packing Company  
PO Box 1448  
Los Banos, CA 93635

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # N-1276  
Project # N-1143218**

Dear Mr. Sousa:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The modification is to increase the allowable start-up time from 0.5 hour to 2 hours.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

  
Arnaud Marjollet  
Director of Permit Services

AM:MS/st

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
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**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
Boiler

Facility Name:	Ingomar Packing Company	Date:	December 24, 2014
Mailing Address:	PO Box 1448 Los Banos, CA 93635	Engineer:	Mark Schonhoff
Contact Person:	Rick Sousa	Lead Engineer:	Nick Peirce
Telephone:	(209) 826-9494 x 179		
Fax:	N/A		
E-Mail:	rick.sousa@ingomar.com		
Application #(s):	N-1276-18-2		
Project #:	N-1143218		
Deemed Complete:	October 21, 2014		

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**I. Proposal**

The applicant is proposing to receive an Authority-to-Construct permit to increase the boiler start-up period from 0.5 hr/day to 2 hr/day. No change to the number of allowable annual start-up hours is proposed.

**II. Applicable Rules**

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4304	Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters (10/19/1995)
Rule 4305	Boilers, Steam Generators and Process Heaters – Phase II (8/21/03)
Rule 4306	Boilers, Steam Generators and Process Heaters – Phase III (3/17/05)
Rule 4320	Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
Rule 4351	Boilers, Steam Generators and Process Heaters – Phase 1 (8/21/03)
Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177:	California Environmental Quality Act (CEQA)

California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

### **III. Project Location**

9950 S. Ingomar Grade  
Los Banos, CA

### **V. Equipment Listing**

#### **Premodification:**

180 MMBTU/HR NATURAL GAS FIRED NEBRASKA MODEL 500D-100 BOILER EQUIPPED WITH A JOHN ZINK VARIFLAME BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A HALDOR TOPSOE SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION.

#### **Postmodification:**

No change.

### **VI. Emission Control Technology Evaluation**

The unit will be equipped with a flue gas recirculation system and a selective catalytic reduction (SCR) system. Both of these systems are for NOx control.

#### **Flue Gas Recirculation System:**

A flue gas recirculation system recycles a portion of the exhaust gas back into the burner. Since the exhaust gas contains little oxygen, it has the effect of reducing the flame temperature, which in turn, reduces the formation of thermal NOx.

#### **Selective Catalytic Reduction System:**

SCR systems work by injecting ammonia vapor into the exhaust gas, which is then passed through a catalyst. In the catalyst, the ammonia reacts with the NOx and oxygen to form nitrogen and water. Such systems typically provide at least 85% NOx control.

### **VII. General Calculations**

#### **A. Assumptions**

To streamline emission calculations, PM2.5 emissions are assumed to be equal to PM10 emissions. Only if needed to determine if a project is a Federal major modification for PM2.5 will specific PM2.5 emission calculations be performed.

## B. Emission Factors

The premodification emission factors are from the current PTO. No changes are proposed.

Pollutant	Emission Factors – lb/MMBtu (ppmvd @ 3% O <sub>2</sub> )	
	Premodification	Postmodification
NO <sub>x</sub> (steady state)	5 ppmvd @ 3% O <sub>2</sub> or 0.0062 lb/MMBtu	No change
NO <sub>x</sub> (startup/shutdown)	40 ppmvd @ 3% O <sub>2</sub> or 0.048 lb/MMBtu	No change
CO (steady state)	100 ppmvd @ 3% O <sub>2</sub> or 0.074 lb/MMBtu	No change
CO (startup/shutdown)	400 ppmvd @ 3% O <sub>2</sub> or 0.3 lb/MMBtu	No change
VOC	0.004 lb/MMBtu	No change
SO <sub>x</sub>	0.00285 lb/MMBtu	No change
PM <sub>10</sub>	0.0076 lb/MMBtu	No change
Ammonia	10 ppmvd @ 3% O <sub>2</sub>	No change

## C. Calculations

### 1. Pre-Project Potential to Emit (PE1)

#### Premodification:

The following are from the Application Review document for project N-1094036.

$$PE_{NOx} = 30.5 \text{ lb/day}$$

$$PE_{NOx} = 3,095 \text{ lb/yr}$$

$$PE_{CO} = 340.0 \text{ lb/day}$$

$$PE_{CO} = 35,964 \text{ lb/yr}$$

$$PE_{VOC} = 17.3 \text{ lb/day}$$

$$PE_{VOC} = 1,900 \text{ lb/yr}$$

$$PE_{SOx} = 12.3 \text{ lb/day}$$

$$PE_{SOx} = 1,354 \text{ lb/yr}$$

$$PE_{PM10} = 32.8 \text{ lb/day}$$

$$PE_{PM10} = 3,610 \text{ lb/yr}$$

$$PE_{NH3} = 19.3 \text{ lb/day}$$

$$PE_{NH3} = 2,127 \text{ lb/yr}$$

## 2. Post Project Potential to Emit (PE2)

### Postmodification:

The proposed change is to increase the combined startup period duration from 0.5 hr/day to 2 hr/day. No change to the annual startup period of 20 hours is proposed. During startup periods, the unit operates under higher emission limits for NOx and CO. Therefore, the daily NOx and CO emissions must be recalculated. No changes to the daily potentials to emit of VOC, SOx or PM10 or to the annual potential to emit of any pollutant will occur.

$$PE_{NOx} = (180 \text{ MMBtu/hr})[(0.0062 \text{ lb/MMBtu})(22 \text{ hr/day}) \\ + (0.048 \text{ lb/MMBtu})(2 \text{ hr/day})] = 41.8 \text{ lb/day}$$

$$PE_{NOx} = 3,095 \text{ lb/yr (no change)}$$

$$PE_{CO} = (180 \text{ MMBtu/hr})[(0.074 \text{ lb/MMBtu})(22 \text{ hr/day}) \\ + (0.3 \text{ lb/MMBtu})(2 \text{ hr/day})] = 401.0 \text{ lb/day}$$

$$PE_{CO} = 35,964 \text{ lb/yr (no change)}$$

$$PE_{VOC} = 17.3 \text{ lb/day (no change)}$$

$$PE_{VOC} = 1,900 \text{ lb/yr (no change)}$$

$$PE_{SOx} = 12.3 \text{ lb/day (no change)}$$

$$PE_{SOx} = 1,354 \text{ lb/yr (no change)}$$

$$PE_{PM10} = 32.8 \text{ lb/day (no change)}$$

$$PE_{PM10} = 3,610 \text{ lb/yr (no change)}$$

$$PE_{NH3} = 19.3 \text{ lb/day (no change)}$$

$$PE_{NH3} = 2,127 \text{ lb/yr (no change)}$$

## 2. Pre-Project Stationary Source Potential to Emit (SSPE1)

Except for CO, the following SSPE balance is from the Application Review document for project N-1113286. The facility-wide PE of CO is from permit N-1276-0-3

	SSPE1				
	NOx (lb/yr)	CO (lb/yr)	VOC (lb/yr)	SOx (lb/yr)	PM10 (lb/yr)
N-1276-1-13	33,709	167,538	16,198	15,897	23,372
N-1276-2-14					
N-1276-3-14					
N-1276-8-7					
N-1276-9-7					
N-1276-15-4					
N-1276-18-1					
N-1276-19-0	0		0	0	438
N-1276-20-0	138		20	0	8
<b>Total w/o ERC</b>	<b>33,847</b>	<b>167,538</b>	<b>16,218</b>	<b>15,897</b>	<b>23,818</b>
ERC	0	0	0	0	0
<b>Total</b>	<b>33,847</b>	<b>167,538</b>	<b>16,218</b>	<b>15,897</b>	<b>23,818</b>

## 4. Post Project Stationary Source Potential to Emit (SSPE2)

	SSPE2				
	NOx (lb/yr)	CO (lb/yr)	VOC (lb/yr)	SOx (lb/yr)	PM10 (lb/yr)
N-1276-1-13	33,709	167,538	16,198	15,897	23,372
N-1276-2-14					
N-1276-3-14					
N-1276-8-7					
N-1276-9-7					
N-1276-15-4					
N-1276-18-2					
N-1276-19-0	0		0	0	438
N-1276-20-0	138		20	0	8
<b>Total w/o ERC</b>	<b>33,847</b>	<b>167,538</b>	<b>16,218</b>	<b>15,897</b>	<b>23,818</b>
ERC	0	0	0	0	0
<b>Total</b>	<b>33,847</b>	<b>167,538</b>	<b>16,218</b>	<b>15,897</b>	<b>23,818</b>

## 5. Major Source Determination

### Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with an SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)

- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

The Major Source thresholds, the facility potentials to emit and whether or not the facility is a Major Source are presented on the following table. The Major Source thresholds are from Section 3.24.1. Since no emission reduction credits have been generated at this facility, the post-modification potential to emit is equivalent to the SSPE2.

Pollutant	Threshold (lb/yr)	Facility PE (lb/yr)	Major Source
NOx	20,000	33,847	Yes
CO	200,000	167,538	No
VOC	20,000	16,218	No
SOx	140,000	15,897	No
PM10	140,000	23,818	No

**Rule 2410 Major Source Determination:**

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO2	CO	VOC	SOx	PM	PM10
Estimated Facility PE before Project Increase	16.9	83.8	8.1	7.9	11.9	11.9
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	No	No	No	No	No	No

As shown above, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

**6. Baseline Emissions (BE)**

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or

- Any Clean Emissions Unit, located at a Major Source

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

**NOx:**

The facility is a Major Source for NOx. Section 3.8.1.4 of Rule 2201 states that for Major Source pollutants, the Baseline Emissions are equal to the premodification potential to emit if all units in the SLC are Clean Emission Units. The boiler is part of an SLC (fuel usage limit of 19,600 Btu/day), therefore, a Clean Emission Unit determination is required for each unit in the SLC.

BACT guideline 1.1.2 (Boilers > 20 MMBtu/hr), which applied to these units was rescinded and is being updated. In the interim, the District is considering the Achieved-in-Practice NOx BACT level for boilers rated at over 20 MMBtu/hr to be 7 ppmvd @ 3% O<sub>2</sub>. Since the guideline was in effect within the past 5 years, units meeting 7 ppmvd NOx @ 3% O<sub>2</sub> may be deemed Clean Emission Units.

Permit	Description	BACT Guideline	Achieved-in-Practice BACT Level	Achieved-in-Practice BACT Met
N-1276-1-13 N-1276-2-14 N-1276-3-14 N-1276-8-7 N-1276-9-7 N-1276-15-4 N-1276-18-1	Boilers	1.1.2	NOx emissions of 7 ppmvd @ 3% O <sub>2</sub> or less	Yes, condition 5 Yes, condition 6 Yes, condition 6 Yes, condition 4 Yes, condition 5 Yes, condition 5 Yes, condition 6
N-1275-20-0	Emergency fire pump	3.1.4	NOx emissions of 6.9 g/bhp or less	Yes, condition 5

All of the NOx emitting units included in the SLC are Clean Emission Units for NOx, therefore, the Baseline Emissions for NOx are equal to the SLC.

BE<sub>NOx</sub> = 33,847 lb/yr

**CO, VOC, SOx and PM10:**

The purpose of determining Baseline Emissions is for use in quantity-of-offsets calculations. The SSPE2 of each of these pollutants is less than its offset threshold, therefore quantity-of-offset calculations are not required. Since quantity-of-offsets

calculations are not required for these pollutants, it is not necessary to determine their Baseline Emissions.

## 7. SB 288 Major Modification

This facility is a Major Source for only NO<sub>x</sub>, therefore, an SB-288 Major Modification determination is required for only NO<sub>x</sub>.

An SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is a Major Source for NO<sub>x</sub>, the project's PE2 of NO<sub>x</sub> is compared to the SB 288 Major Modification Threshold in the following table in order to determine if an SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO <sub>x</sub>	3,095	50,000	No

Since the SB 288 Major Modification threshold for NO<sub>x</sub> is not surpassed with this project, this project is not an SB 288 Major Modification.

## 8. Federal Major Modification

This facility is a Major Source for only NO<sub>x</sub>, therefore, a Federal Major Modification determination is required for only NO<sub>x</sub>.

The District draft policy "Implementation of Rule 2201 (as amended on 12/18/08 and approved by EPA on 6/10/10) for SB 288 Major Modifications and Federal Major Modifications (9/28/10)" is referenced to determine the emissions increase. Case 2 in the draft policy states "If the proposed modification does not result in an increase in design capacity or annual potential to emit, and it does not impact the ability of the emission unit to operate at a higher utilization rate, then the unused baseline capacity emissions can also be excluded from the emission increase (EI).

Neither the rating or the utilization rate will increase and there will not be an increase in the annual potential to emit, therefore, the above referenced draft policy allows the unused baseline capacity to be included in the EI calculation. EI is as follows:

$EI = PAE - BAE - \text{unused baseline capacity}$ , where

PAE = post-project projected actual emissions

BAE = pre-project baseline actual emissions

unused baseline capacity = PE1 - BAE

The proposed modification will not increase the boiler's permitted utilization, therefore:

$$\begin{aligned}EI_{NOx} &= PE2_{NOx} - BAE_{NOx} - (PE1_{NOx} - BAE_{NOx}) \\ &= PE2_{NOx} - BAE_{NOx} - PE1_{NOx} + BAE_{NOx} \\ &= PE2_{NOx} - PE1_{NOx}\end{aligned}$$

$$PE1_{NOx} = 3,095 \text{ lb/yr}$$

$$PE2_{NOx} = 3,095 \text{ lb/yr}$$

$$EI_{NOx} = 3,095 \text{ lb/yr} - 3,095 \text{ lb/yr} = 0 \text{ lb/yr}$$

The NOx emission increase will not exceed the Federal Major Modification threshold, therefore, this permitting action is not a Federal Major Modification.

#### **9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination**

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10

## I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project is a new major source subject to PSD requirements.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	CO	VOC	SOx	PM	PM10
Total PE from New and Modified Units	1.55	18.0	0.95	0.68	1.81	1.81
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	No	No	No	No	No	No

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

## 10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix D.

## VIII. Compliance

### Rule 2201 New and Modified Stationary Source Review Rule

#### A. Best Available Control Technology (BACT)

##### 1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions\*:

- a. Any new emissions unit with a potential to emit exceeding 2.0 pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding 2.0 pounds per day,

- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding 2.0 pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

\*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

**a. New emissions units – PE > 2.0 lb/day**

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2.0 lb/day purposes is not triggered.

**b. Relocation of emissions units – PE > 2.0 lb/day**

No relocated units.

**c. Modification of emissions units – AIPE > 2.0 lb/day**

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE2} - (\text{PE1} * (\text{EF2} / \text{EF1}))$$

**NOx:**

$$\text{PE1} = 30.5 \text{ lb/day}$$

$$\text{PE2} = 41.8 \text{ lb/day}$$

$$\text{EF2}/\text{EF1} = 1 \text{ (no change to the emission factors)}$$

$$\text{AIPE} = 41.8 \text{ lb/day} - 30.5 \text{ lb/day}(1) = 11.3 \text{ lb/day}$$

As shown above, the AIPE is greater than 2.0 lb/day for NO<sub>x</sub>. Therefore BACT is required for NO<sub>x</sub>.

**CO:**

PE1 = 340.0 lb/day

PE2 = 401.0 lb/day

EF2/EF1 = 1 (no change to the emission factors)

AIPE = 401.0 lb/day – 340.0 lb/day(1) = 61.0 lb/day

As shown above, the AIPE is greater than 2.0 lb/day for CO. However, as shown in section VII.C.4 of this document, the SSPE2 of CO is less than 200,000 lb/yr. Since the SSPE2 of CO is less than 200,000 lb/yr, BACT is not required for CO.

**VOC, SO<sub>x</sub> and PM<sub>10</sub>:**

As shown in sections VII.C.1 and VII.C.2 of this document, there will not be a change in the potential to emit of any of these pollutants and as shown in section VII.B, there will not be a change in the emission factor for any of these pollutants. Therefore, AIPE is zero for these pollutants and BACT is not required.

**d. SB 288/Federal Major Modification**

The facility is a Major Source for only NO<sub>x</sub> and as shown in Sections VII.C.7 and VII.C.8 above, this project is not an SB 288 and/or Federal Major Modification for NO<sub>x</sub> emissions.

**2. Top-Down BACT Analysis**

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached Top-Down BACT Analysis (see Appendix C), BACT will be satisfied with the following:

NO<sub>x</sub>: NO<sub>x</sub> emissions of 5 ppmvd @ 3% O<sub>2</sub> or less (or 0.0062 lb/MMBtu or less)

Bring NO<sub>x</sub> control system into service as soon as practical (that amount of time has been determined to be within 2 hours after initial start-up)

To enforce BACT, the following conditions will be included in the ATC and the PTO:

*The NO<sub>x</sub> emissions shall, except during start-up periods, shall not exceed 5 ppmvd @ 3% O<sub>2</sub> or 0.0062 lb/MMBtu.*

The combined start-up duration shall not exceed 2 hours during any one day.

The NOx emission control system shall be brought fully online as soon as practical.

## B. Offsets

### 1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO <sub>x</sub>	CO	VOC	SO <sub>x</sub>	PM10
SSPE2	33,847	167,538	16,218	15,897	23,818
Offset Thresholds	20,000	200,000	20,000	54,750	29,200
Offsets triggered?	Yes	No	No	No	No

### 2. Quantity of Offsets Required

As discussed above, the facility is an existing Major Source for NO<sub>x</sub> and the SSPE2 is greater than the offset thresholds; therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for NO<sub>x</sub> is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) =  $(\sum[PE2 - BE] + ICCE) \times DOR$ , for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historical Actual Emissions (HAE)

Pursuant to District Policy APR 1420, *NSR Calculations for Units with Specific Limiting Conditions (3/12/07)*, the quantity of ERCs for a project will be determined by comparing the post-project PE, which is the SLC, to the pre-project BE for the SLC.

Additionally, the policy states that if the SLC is for a pollutant exceeding the Major Source threshold and any single unit under the SLC is not a Highly-Utilized, Fully-Offset, or Clean Emissions Units, then the sum of the actual emissions from all units in SLC will be used to determine the pre project BE.

As shown in section VII.C.6 of this document, all of the units in the SLC are Clean Emission Units, therefore the Baseline Emissions are equal to the pre-project PE emissions ( $BE_{SLC} = PE1_{SLC}$ ).

Based on the information above, the emissions increase to be offset for this project should be calculated as follows:

$$\text{Emissions Increase (lb/year)} = PE2_{SLC} - BE_{SLC}$$

Where,

$PE2_{SLC}$  = The post project SLC selected by the facility. In this project,  $PE2_{SLC} = PE1_{SLC}$ .  
 $BE_{SLC} = 33,847$  lb-NOx/year.

Therefore,

$$\begin{aligned} \text{Emissions Increase (lb/year)} &= PE2_{SLC} - BE_{SLC} \\ &= 33,847 \text{ lb-NOx/year} - 33,847 \text{ lb-NOx/year} \\ &= 0 \text{ lb-NOx/year} \end{aligned}$$

As shown above, offsets are not required for this project.

## C. Public Notification

### 1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant
- e. Any project that results in a Title V significant permit modification

**a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications**

New Major Sources are new facilities, that are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As shown in Sections VII.C.7 and VII.C.8, this project is not an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

**b. PE > 100 lb/day**

Applications that include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

**c. Offset Threshold**

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO <sub>x</sub>	33,847	33,847	20,000 lb/year	No
CO	167,538	167,538	200,000 lb/year	No
VOC	16,218	16,218	20,000 lb/year	No
SO <sub>x</sub>	15,897	15,897	54,750 lb/year	No
PM <sub>10</sub>	23,818	23,818	29,200 lb/year	No

As shown above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

**d. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in an SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

<b>SSIPE Public Notice Thresholds</b>					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO <sub>x</sub>	33,847	33,847	0	20,000 lb/year	No
CO	167,538	167,538	0	20,000 lb/year	No
VOC	16,218	16,218	0	20,000 lb/year	No
SO <sub>x</sub>	15,897	15,897	0	20,000 lb/year	No
PM10	23,818	23,818	0	20,000 lb/year	No

As shown above, the SSIPEs for all pollutants are less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

**e. Title V Significant Permit Modification**

As shown in the discussion of Rule 2520 below, this project is not a Title V significant modification (it is a Title V minor modification). Therefore, public noticing for Title V significant modifications is not required for this project.

**2. Public Notice Action**

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, a public notice will not be required for this project.

**D. Daily Emission Limits (DELs)**

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

**Proposed Rule 2201 (DEL) Conditions:**

NO<sub>x</sub> emissions during non-start-up periods shall not exceed 5 ppmvd @ 3% O<sub>2</sub> or 0.0062 lb/MMBtu referenced as NO<sub>2</sub>.

NO<sub>x</sub> emissions during start-up periods shall not exceed 40 ppmvd @ 3% O<sub>2</sub> or 0.048 lb/MMBtu referenced as NO<sub>2</sub>.

CO emissions during non-start-up periods shall not exceed 100 ppmvd @ 3% O<sub>2</sub> or 0.074 lb/MMBtu.

CO emissions during start-up periods shall not exceed 400 ppmvd @ 3% O<sub>2</sub> or 0.3 lb/MMBtu.

VOC emissions shall not exceed 0.004 lb/MMBtu.

SOx emissions shall not exceed 0.00285 lb/MMBtu.

PM10 emissions shall not exceed 0.0076 lb/MMBtu.

Ammonia (NH<sub>3</sub>) emissions shall not exceed 10 ppmvd @ 3% O<sub>2</sub> over a 15 minute averaging period.

The combined start-up duration shall not exceed 2 hours during any one day and shall not exceed 20 hours per calendar year. [District Rules 2201, 4305, 4306 and 4320] N

## **E. Compliance Assurance**

### **1. Source Testing**

District Rules 4305, 4306 and 4320 require NO<sub>x</sub> and CO emission testing not less than once every 12 months. Gaseous fuel fired units demonstrating compliance on two consecutive compliance source tests may defer the following source test for up to thirty-six months. The District Source Test Policy (APR 1705) requires annual testing for all pollutants controlled by catalysts. The control equipment will include an SCR system and ammonia slip is an indicator of how well the SCR system is performing.

Therefore, source testing for NO<sub>x</sub>, CO, and ammonia at least once every 12 months will be required. Upon demonstrating compliance on two consecutive source tests, the following source test may be deferred for up to thirty-six months.

### **2. Monitoring**

A predictive emission monitoring system (PEMS) is utilized to monitor NO<sub>x</sub> and CO emissions. That system was previously deemed equivalent to the Rule 4320 monitoring requirements (Application Review document for Project N-1094036).

The monitoring required by 40 CFR Part 60, Subpart Db and 40 CFR Part 64 is specified on the current PTO. Those requirements will be placed on this ATC.

### **3. Recordkeeping**

The tune-up and start-up duration records required by District Rule 4320 are included on the current PTO and will be included on the proposed ATC.

To make it possible to verify compliance with the daily fuel usage limit, records of the fuel usage will continue to be required.

To make it possible to verify compliance with the daily and annual start-up duration limits, records of start-up periods will be required.

### **4. Reporting**

The reporting required by 40 CFR Part 60 Subpart Db is specified on the current PTO. Those requirements will be placed on this ATC.

### **Rule 2410 Prevention of Significant Deterioration**

As shown in Section VII.C.9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

### **Rule 2520 Federally Mandated Operating Permits**

This rule applies to Major Sources of air pollutants and to Major Air Toxics Sources. The facility is operating under a Title V permit and this permitting action is a Minor Modification to that permit. The applicant has proposed to receive the Authority to Construct permit with a Certificate of Conformity so the following conditions will be placed on the Authority to Construct permit.

*{1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Y*

*{1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Y*

### **Rule 4001 New Source Performance Standards (NSPS)**

#### **40 CFR Part 60 Subpart Db**

This rule applies to boilers that are rated at more than 100 MMBtu/hr. The boiler currently under consideration is rated at 180 MMBtu/hr and is therefore a subject unit. Compliance with this rule was address during the processing of the applications for project N-1113823 (Title V Permit Renewal) and since the modification will consist solely of increasing the daily start-up duration, a re-evaluation is not necessary.

## **Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

### **40 CFR Part 63 Subpart DDDDD**

Per section 63.7485, this rule applies to industrial, commercial and institutional boilers and process heaters that are located at major sources of HAP emissions. During the processing of the applications for project N-1113286, the facility was determined to be a non-major source of HAP emissions, therefore, this rule does not apply.

## **Rule 4101 Visible Emissions**

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). As the boiler is fired solely on natural gas, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility continued compliance is expected.

## **Rule 4102 Nuisance**

### **A. California Health & Safety Code 41700 (Risk Management Review)**

Increases in health risk are determined based on hourly and annual emissions of hazardous air pollutants (HAPs). In the case of boilers, HAP emissions are directly proportional to fuel usage. Since there will not be an hourly or annual increase in fuel usage, there will not be an hourly or annual increase in HAP emissions. Therefore, there will be no change in the health risk associated with the use of this boiler and a risk management review is not required.

### **B. Toxics BACT (T-BACT)**

As explained above, there will not be an hourly or annual change fuel usage, therefore, Toxics BACT is not required.

## **Rule 4201 Particulate Matter Concentration**

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

EF <sub>PM10</sub> :	0.076 lb/MMBtu
Rating:	180 MMBtu/hr
Exhaust Flow:	62,216 cfm (Application Review Document for Project N-1094036)

$$PE = (0.076 \text{ lb/MMBtu})(180 \text{ MMBtu/hr}) = 1.4 \text{ lb/hr}$$

$$\text{Concentration} = (1.4 \text{ lb/hr})(7,000 \text{ gr/lb})(1 \text{ hr}/60 \text{ min})(\text{min}/62,216 \text{ ft}^3) = 0.003 \text{ gr/ft}^3$$

The unit is expected to comply with the PM limit of 0.1 gr/dscf of exhaust flow.

**Rule 4304 Equipment Tuning Procedure for Boilers, Steam Generators and process Heaters**

Rule 4320 requires that the units be periodically tuned and requires that the tune-ups be performed in accordance with section 5.2.1 of this rule. The necessary conditions will be included on the Authority to Construct and the Permit to Operate.

**Rule 4305 Boilers, Steam Generators and Process Heaters – Phase II**

Pursuant to Section 2.0 of District Rule 4305, this unit is subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters – Phase 2*.

Since the requirements of District Rule 4320 are either equivalent to, or more stringent than the requirements of District Rule 4305, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4305. Therefore, no further discussion is required.

**Rule 4306 Boilers, Steam Generators and Process Heaters – Phase III**

Pursuant to Section 2.0 of District Rule 4306, this unit is subject to District Rule 4306, *Boilers, Steam Generators and Process Heaters – Phase 3*.

Since the requirements of District Rule 4320 are either equivalent or more stringent than the requirements of District Rule 4306, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4306. Therefore, no further discussion is required.

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

**Applicability:**

The rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator or process heater with a heat input rating of greater than 5 MMBtu/hr.

The unit currently under consideration is a boiler rated at more than 5 MMBtu/hr. Therefore, it is subject to this rule.

**Emission Limits:**

**NOx Limit:**

The unit is rated at more than 20 MMBtu/hr and is therefore subject to the Category B NOx emission limit of Table 1. That limit is 7 ppmvd @ 3% O<sub>2</sub> or 0.008 lb/MMBtu. The applicant is proposing to limit the NOx emissions from this unit to 5 ppmvd @ 3% O<sub>2</sub>, therefore, compliance with the NOx emission limit of this rule is expected.

**CO Limit:**

Per section 5.2.1, the CO emission limit is 400 ppmvd @ 3% O<sub>2</sub>. The applicant is proposing CO limits of much less than this, therefore, compliance with the CO emission limit of this rule is expected.

**Start-Up Period Emissions:**

Section 5.6 of this rule states that neither the Section 5.2 (Table 1) NO<sub>x</sub> emission standard or the section 5.5.2 CO emission standard apply during start-up and shutdown periods provided the duration of no start-up or shutdown event is longer than 2 hours and the emissions are controlled to the maximum extent possible during these periods. The applicant has proposed to increase the start-up duration from 0.5 hr/day to 2 hr/day and will be required to control the emissions to the maximum extent possible during start-up.

**Control Requirements:****Particulate Matter Control:**

Section 5.1.1 requires that particulate matter be controlled by one of the methods specified in sections 5.4.1.1 through 5.4.1.4.

Section 5.4.1.1 states that compliance may be met by operating the unit solely on PUC-quality natural gas, commercial propane, butane, liquefied petroleum gas, or a combination of such gasses. The applicant is proposing to fire the unit solely on natural gas, therefore compliance with the particulate matter control requirement of this rule is expected.

**Monitoring:****NO<sub>x</sub>, CO and O<sub>2</sub> Monitoring:**

Section 5.7.1 requires the operator of a unit subject to section 5.2 of this rule to install and maintain Continuous Emission Monitoring (CEM) equipment for NO<sub>x</sub>, CO and O<sub>2</sub>, or to conduct alternate District approved monitoring.

A predictive emission monitoring system (PEMS) is utilized to monitor NO<sub>x</sub> and CO emissions. That system was previously deemed acceptable in satisfying District NO<sub>x</sub> and CO monitoring requirements. The current Permit-to-Operate includes the following condition:

*The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [40 CFR Part 60, Subpart Db]*

The facility operator is also monitoring CO utilizing the PEMS system as required by Rule 4320. To clarify the requirement to monitor CO, the above condition will be modified as follows:

*The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b and District Rule 4320 and shall comply with the emission monitoring requirements for CO given in District Rule 4320. The monitoring shall be conducted utilizing the predictive emission monitoring system. [District Rule 4320 and 40 CFR Part 60.48b] Y*

**SOx Emission Monitoring:**

Facilities complying with sections 5.4.1.1 or 5.4.1.2 of this rule are required by section 5.7.6.1 to provide a fuel analysis to the District on at least an annual basis. The unit currently under consideration will fire solely on PUC-quality natural gas and is therefore subject to section 5.4.1.1.

Per District Policy APR 1720, the District assumes that natural gas has a sulfur content not exceeding 1.0 grain/100 scf. Therefore, the District will accept analyses or other equivalent certification documents from the fuel supplier for demonstrating compliance with the SO<sub>x</sub> emission monitoring requirement. The following condition will be included on the permit:

*{4356} 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] N*

**Record Keeping:**

Section 6.1.3 requires the operator to maintain the records necessary to verify that the required tune-ups have been conducted and that the operational characteristics of the units have been monitored as required. Such records will be required.

Section 6.1.4 requires that records of the duration of each start-up and shut-down period be kept. Such records will be required.

Section 6.1 requires that all records be maintained for a period of at least 5 years and that they be made available to the District and to the EPA upon request. Such record retention will be required by the Authorities to Construct and the Permits to Operate.

**Source Testing:**

Section 6.3.1 of this rule requires that the subject units be source tested to determine compliance with the applicable emission limits of this rule at least once every 12 months. Once compliance is shown on two consecutive 12-month tests, the testing frequency may decrease to once every 36 months. This section further states that if compliance is not shown during a 36 month test, the testing frequency shall revert to

once every 12 months. The ATC and the PTO will require that testing be conducted at this frequency.

Section 6.2 of this rule specifies the source test methods that may be utilized. The ATC and the PTO will include conditions specifying the test methods to be used.

#### **Tune-ups:**

Section 6.3.1.1 requires that during each 36 month source testing interval, the units be tuned in accordance with the provisions of section 5.5.1 of this rule. Section 5.5.1 specifies the frequency, requires that the tune-ups be conducted by a qualified technician and requires they be performed in accordance with District Rule 4304. The conditions necessary to enforce the applicable tuning requirements will be included on the ATC and the PTO.

### **Rule 4351 Boilers, Steam Generators and Process Heaters – Phase 1**

The facility is a Major source for NO<sub>x</sub>, therefore, this rule applies.

#### **Section 5.0 - Emission Limits:**

Section 5.2.2 of this rule limits the NO<sub>x</sub> emissions to 30 ppmvd @ 3% O<sub>2</sub>. The steady-state NO<sub>x</sub> limit is currently 5 ppmvd @ 3% O<sub>2</sub> and no change is proposed. Therefore, compliance with this limit is expected.

Section 5.5 of this rule limits the CO emissions to 400 ppmvd @ 3% O<sub>2</sub>. The steady-state CO limit is currently 100 ppmvd @ 3% O<sub>2</sub> and no change is proposed. Therefore, compliance with this limit is expected.

#### **Section 5.6 - Monitoring**

Section 5.6.2 of this rule requires that units equipped with NO<sub>x</sub> control technology install and maintain provisions to monitor the operational characteristics of the NO<sub>x</sub> control system. The boiler is equipped with an SCR system and a flue gas recirculation system for NO<sub>x</sub> control. The facility operator is currently required to monitor the SCR catalyst temperature. No changes to the SCR system monitoring requirement is proposed so continued compliance is expected.

#### **Section 6.1 – Record Keeping**

Section 6.1.1 requires that the Higher Heating Value (HHV) of the fuel be determined annually. The permit currently requires such a determination and no changes are proposed. Therefore, continued compliance is expected.

## **Section 6.3 - Compliance Testing, Tune-Ups and Monitoring**

### **Compliance Testing:**

Section 6.3.1 of this rule requires source testing to show compliance with the NOx and CO limits of this permit annually. Once two consecutive annual tests show compliance with the NOx and CO limits the frequency may be reduced to once every 36 months. The current PTO includes the necessary source testing conditions and no changes to those requirements are proposed. Therefore, continued compliance is expected.

### **Tune - Ups:**

Section 6.3.1 also requires that tune-ups be performed in accordance with section 5.2.1. Section 5.2.1 requires that annual tune-ups be conducted in accordance with District Rule 4304. Such tune-ups are currently required and no changes to those requirements are proposed. Therefore, continued compliance is expected.

## **Rule 4801 Sulfur Compounds**

This rule limits the sulfur compound emissions to 2000 ppmv. The unit will fire solely on PUC-quality natural gas. The low sulfur content of the fuel will ensure compliance with this rule.

## **California Health & Safety Code 42301.6 (School Notice)**

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

## **California Environmental Quality Act (CEQA)**

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

## Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

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

## District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

## IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATC N-1276-18-2 subject to the permit conditions on the attached draft ATC in Appendix A.

## X. Billing Information

### Premodification:

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
N-1276-18	3020-02-H	180,000 MMBtu/hr	\$1,030

### Postmodification:

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
N-1276-18	3020-02-H	180,000 MMBtu/hr	\$1,030

## **Appendices**

- A: Draft ATC
- B: Current PTO
- C: BACT Analysis
- D: Quarterly Net Emissions Change
- E: Compliance Certification Form

**Appendix A**  
**Draft Authority-to-Construct Permit**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT

PERMIT NO: N-1276-18-2

LEGAL OWNER OR OPERATOR: INGOMAR PACKING COMPANY

MAILING ADDRESS: P O BOX 1448  
LOS BANOS, CA 93635

LOCATION: 9950 S INGOMAR GRADE  
LOS BANOS, CA 93635

**EQUIPMENT DESCRIPTION:**

180 MMBTU/HR NATURAL GAS FIRED NEBRASKA MODEL 500D-100 BOILER EQUIPPED WITH A JOHN ZINK VARIFLAME BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A HALDOR TOPSOE SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION. MODIFICATION TO INCREASE THE STARTUP PERIOD TO 2 HOURS PER DAY.

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} 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]
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. The boiler shall be fired only on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. The heat input into this unit shall not exceed 475,000 MMBtu during any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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

Arnaud Marjollet, Director of Permit Services

N-1276-18-2 Dec 24 2014 KJ/LAM - SCHONHOM : Joint Inspection NOT Required

8. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The combined start-up duration shall not exceed 2 hours during any one day and shall not exceed 20 hours per calendar year. [District Rules 2201, 4305, 4306 and 4320]
10. NO<sub>x</sub> emissions during non-start-up periods shall not exceed 5 ppmvd @ 3% O<sub>2</sub> or 0.0062 lb/MMBtu referenced as NO<sub>2</sub>. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. NO<sub>x</sub> emissions during start-up periods shall not exceed 40 ppmvd @ 3% O<sub>2</sub> or 0.048 lb/MMBtu referenced as NO<sub>2</sub>. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. The NO<sub>x</sub> emission control system shall be brought fully online as soon as practical. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. CO emissions during non-start-up periods shall not exceed 100 ppmvd @ 3% O<sub>2</sub> or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. CO emissions during start-up periods shall not exceed 400 ppmvd @ 3% O<sub>2</sub> or 0.3 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. VOC emissions shall not exceed 0.004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. SO<sub>x</sub> emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM<sub>10</sub> emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Ammonia (NH<sub>3</sub>) emissions shall not exceed 10 ppmvd @ 3% O<sub>2</sub> over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The catalyst temperature shall be maintained at 350 degrees Fahrenheit, or higher, whenever the boiler is operated, except during start-up or shutdown periods. [40 CFR Part 64] Federally Enforceable Through Title V Permit
20. The catalyst temperature shall be monitored at least on a daily basis. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [40 CFR Part 64] Federally Enforceable Through Title V Permit
21. Source testing to determine compliance with the NO<sub>x</sub>, CO and ammonia emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 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 months. [District Rules 4305, 4306 and 4320]
22. 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, 7.1] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
24. 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
25. 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

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CONDITIONS CONTINUE ON NEXT PAGE

26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
27. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. 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
29. 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
30. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
32. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
33. The records necessary to show the required tune-ups were conducted shall be kept. [District Rule 4320]
34. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
35. A record of the fuel usage of this unit, on a 12 month rolling total basis shall be kept. The record shall be updated at least once every calendar month. [District Rule 2201] Federally Enforceable Through Title V Permit
36. A daily record of the catalyst temperature, shall be kept. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
38. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit
39. 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] Federally Enforceable Through Title V Permit
40. 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, 4.0, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
41. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
42. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b and District Rule 4320 and shall comply with the emission monitoring requirements for CO given in District Rule 4320. The monitoring shall be conducted utilizing the predictive emission monitoring system. [District Rule 4320 and 40 CFR Part 60.48b] Federally Enforceable Through Title V Permit
43. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

44. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
45. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
46. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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**Appendix B**  
**Current Permit-to-Operate**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1276-18-1

EXPIRATION DATE: 09/30/2016

## EQUIPMENT DESCRIPTION:

180 MMBTU/HR NATURAL GAS FIRED NEBRASKA MODEL 500D-100 BOILER EQUIPPED WITH A JOHN ZINK VARIFLAME BURNER, AN INDUCED FLUE GAS RECIRCULATION SYSTEM AND A HALDOR TOPSOE SELECTIVE CATALYTIC REDUCTION SYSTEM WITH AMMONIA INJECTION.

## PERMIT UNIT REQUIREMENTS

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1. 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
2. The boiler shall be fired only on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
3. The heat input into this unit shall not exceed 475,000 MMBtu during any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This boiler shall be equipped with a totalizing mass or volumetric fuel flow meter that measures the quantity of natural gas consumed per day (in cubic feet). The meter shall be maintained in proper operating condition at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The combined start-up duration shall not exceed 0.5 hour during any one day and shall not exceed 20 hours per calendar year. [District Rules 2201, 4305, 4306 and 4320]
6. NOx emissions during non-start-up periods shall not exceed 5 ppmvd @ 3% O2 or 0.0062 lb/MMBtu referenced as NO2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. NOx emissions during start-up periods shall not exceed 40 ppmvd @ 3% O2 or 0.048 lb/MMBtu referenced as NO2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. CO emissions during non-start-up periods shall not exceed 100 ppmvd @ 3% O2 or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. CO emissions during start-up periods shall not exceed 400 ppmvd @ 3% O2 or 0.3 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
10. VOC emissions shall not exceed 0.004 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. PM10 emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ammonia (NH3) emissions shall not exceed 10 ppmvd @ 3% O2 over a 15 minute averaging period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The catalyst temperature shall be maintained at 350 degrees Fahrenheit, or higher, whenever the boiler is operated, except during start-up or shutdown periods. [40 CFR Part 64] 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.

15. The catalyst temperature shall be monitored at least on a daily basis. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [40 CFR Part 64] Federally Enforceable Through Title V Permit
16. Source testing to determine compliance with the NO<sub>x</sub>, CO and ammonia emission limits of this permit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 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 months. [District Rules 4305, 4306 and 4320]
17. 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, 7.1] Federally Enforceable Through Title V Permit
18. 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
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 and 4320] 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. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
22. Source testing to measure NO<sub>x</sub> emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. 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
24. Stack gas oxygen (O<sub>2</sub>) 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
25. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. During the 36-month source-testing interval, the owner/operator shall have unit tuned at least twice during each calendar year it operates. The tune-ups shall be four to eight months apart and shall be conducted by a technician that is qualified, to the satisfaction of the APCO. All tune-ups shall be conducted in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
27. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
28. The records necessary to show the required tune-ups were conducted shall be kept. [District Rule 4320]
29. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 2201, 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.

30. A record of the fuel usage of this unit, on a 12 month rolling total basis shall be kept. The record shall be updated at least once every calendar month. [District Rule 2201] Federally Enforceable Through Title V Permit
31. A daily record of the catalyst temperature, shall be kept. [40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Operator shall monitor and record for each unit the HHV and cumulative annual use of natural gas fuel. [District Rules 2201, 2520, 9.3.2 and 4351, 6.1.1] Federally Enforceable Through Title V Permit
33. The HHV of the fuel shall be certified by a third party fuel supplier or shall be determined in accordance with District Rule 4351. [District Rule 2520, 9.3.2 and 4351, 6.2.1] Federally Enforceable Through Title V Permit
34. 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] 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, 4.0, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
36. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
37. The permittee shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [40 CFR Part 60, Subpart Db] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the reporting requirements of 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
39. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
40. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
41. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

## **Appendix C**

### **Top-Down BACT Analysis**

## **BACT analysis for NOx:**

As shown in section VIII (Rule 2201 Compliance), BACT is required for NOx. The BACT guideline that applied has been rescinded and will be revised. During this time, case-by-case BACT determinations are being made. For boilers rated at over 20 MMBtu/hr, the District is considering the Achieved-in-Practice and Technologically-Feasible NOx levels to be 7 ppmvd and 5 ppmvd respectively (both @ 3% O<sub>2</sub>).

### **Step 1 - Identify All Possible Control Technologies**

7 ppmvd NOx @ 3% O<sub>2</sub> or 0.008 lb/MMBtu and commence operation of the NOx control equipment as soon as practical

5 ppmvd NOx @ 3% O<sub>2</sub> or 0.0062 lb/MMBtu and commence operation of the NOx control equipment as soon as practical

### **Step 2 - Eliminate Technologically Infeasible Options**

The above listed emission levels are technologically feasible.

### **Step 3 - Rank Remaining Control Technologies by Control effectiveness**

1. 5 ppmvd NOx @ 3% O<sub>2</sub> or 0.0062 lb/MMBtu and commence operation of the NOx control equipment as soon as practical
2. 7 ppmvd NOx @ 3% O<sub>2</sub> or 0.008 lb/MMBtu and commence operation of the NOx control equipment as soon as practical

### **Step 4 - Cost Effectiveness Analysis:**

The applicant has proposed to meet the most stringent NOx level. Therefore, a cost effectiveness analysis is not required.

### **Step 5 - Select BACT**

BACT for NOx will be a NOx emission level of 5 ppmvd @ 3% O<sub>2</sub> or 0.0062 lb/MMBtu and commencement of operation of the NOx control equipment as soon as practical.

**Appendix D**  
**Quarterly Net Emissions Change (QNEC)**

### Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.

PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.

PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.1 and VII.C.2 in the evaluation above, the annual emission increases are zero. Therefore, the quarterly emission increases are zero also. The emission profile for this unit will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	3,095	1,354	3,610	35,964	1,900
Daily PE	41.8	12.3	32.8	401.0	17.3
Δ PE (Qtr 1)	0	0	0	0	0
Δ PE (Qtr 2)	0	0	0	0	0
Δ PE (Qtr 3)	0	0	0	0	0
Δ PE (Qtr 4)	0	0	0	0	0

**Appendix E**  
**Compliance Certification Form**

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

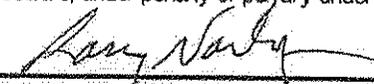
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: Ingomar Packing Company	FACILITY ID: N-1276
1. Type of Organization: <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner: Rick Sousa	

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

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

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

  
 Signature of Responsible Official

10/16/14  
 Date

Larry Narbaitz  
 Name of Responsible Official (please print)

Chief Operating Officer  
 Title of Responsible Official (please print)