



NOV 30 2011

Steven Sylvester
E & J Gallo Winery
PO Box 1130
Modesto, CA 95353

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)
District Facility # N-3386
Project # N-1113046**

Dear Mr. Sylvester:

Enclosed for your review is the District's analysis of your application for Authorities to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The modifications are to lower the NOx emission limits for Rule 4320 compliance.

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authorities 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. Rupl Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

Enclosures
cc: Mark Schonhoff, Permit Services

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



NOV 30 2011

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

Re: **Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)**
District Facility # N-3386
Project # N-1113046

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for E & J Gallo Winery, located at 600 Yosemite Avenue in Modesto, which has been issued a Title V permit. E & J Gallo Winery is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The modifications are to lower the NOx emission limits for Rule 4320 compliance.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # N-3386-2-8 and N-3386-3-7 with Certificate of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Mark Schonhoff, Permit Services

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

Authority to Construct Application Review

Facility Name: E & J Gallo Winery
Mailing Address: PO Box 1130
Modesto, CA 95353

Date: November 28, 2011

Contact Person: Steven Sylvester
Telephone: (209) 341-6804

Engineer: Mark Schonhoff
Application #: N-3386-2-8
N-3386-3-7

Project #: N-1113046
Deemed Complete: September 2, 2011

I. Proposal

The proposal for each unit is the same. The applicant is proposing to receive Authorities to Construct to limit the NO_x emissions to 9 ppmvd @ 3% O₂ for compliance with District Rule 4320. Compliance with the required emission levels has already been shown by source testing so no equipment modifications are necessary.

On May 9, 2011, the units were source tested to determine the NO_x and CO emissions. The tests showed that the NO_x and CO emissions from unit N-3386-2 were 6.88 ppmvd @ 3% O₂ and 5.94 ppmvd @ 3% O₂ respectively and the NO_x and CO emissions from unit N-3386-3 were 7.07 ppmvd @ 3% O₂ and 10.98 ppmvd @ 3% O₂ respectively. Since the applicant is not proposing any increases in permitted emissions and compliance with the proposed limits has already been demonstrated, this permitting action is not subject to Rule 2201 per District guidance document FYI-111 (Case 5).

The facility is currently operating under a Title V permit and this permitting action is a Minor Modification to that permit. The applicant has proposed to proceed with Certificates of Conformity.

II. Applicable Rules

- 2201 New and Modified Stationary Source Review Rule (4/21/11)
- 2520 Federally Mandated Operating Permits (6/21/01)
- 4001 New Source Performance Standards (4/14/99)
- 4101 Visible Emissions (2/17/05)
- 4102 Nuisance (12/17/92)
- 4201 Particulate Matter Concentration (12/17/92)
- 4304 Equipment Tuning Procedure for Boilers, Steam Generators and process Heaters (10/19/09)
- 4305 Boilers, Steam Generators and Process Heaters – Phase 2 (12/19/96)

4306 Boilers, Steam Generators and Process Heaters – Phase 3 (10/16/08)
4320 Advanced Emission Reduction Options for Boilers, Steam Generators and
Process heaters Greater Than 5.0 MMBtu/hr (10/16/08)
4351 Boilers, Steam Generators and Process Heaters – Phase 1 (8/21/03)
4801 Sulfur Compounds (12/17/92)
CH&SC 41700
CH&SC 42301.6

III. Project Location

600 Yosemite Boulevard
Modesto, CA

The equipment is not located within 1,000 feet of a K-12 school.

IV. Process Description

The units will burn natural gas for the purpose of producing hot water and steam for various operations at the facility.

V. Equipment Listing

N-3386-2:

Premodification Equipment Listing:

10.463 MMBTU/HR KEWANEE MODEL #L2S-250-G02 NATURAL GAS-FIRED BOILER (#2) WITH A CLEAVER-BROOKS MODEL NTH105NGX-F9R BURNER AND FLUE GAS RECIRCULATION

Postmodification Equipment Listing:

10.463 MMBTU/HR KEWANEE MODEL #L2S-250-G02 NATURAL GAS-FIRED BOILER WITH A CLEAVER-BROOKS MODEL NTH105NGX-F9R BURNER AND FLUE GAS RECIRCULATION (BOILER #2)

N-3386-3:

Premodification Equipment Listing:

10.2058 MMBTU/HR CLEAVER-BROOKS MODEL CB200-250 NATURAL GAS-FIRED BOILER WITH A CLEAVER-BROOKS/NATCOM MODEL NTI250 LOW NOX BURNER

Postmodification Equipment Listing:

10.2058 MMBTU/HR CLEAVER-BROOKS MODEL CB200-250 NATURAL GAS-FIRED BOILER WITH A CLEAVER-BROOKS/NATCOM MODEL NTI250 LOW NOX BURNER (BOILER #3)

VI. Emission Control Technology Evaluation

No changes to the emission control systems will occur, therefore, a reevaluation is not necessary.

VII. General Calculations

A. Assumptions

Assumptions will be stated as they are made.

B. Emission Factors

As explained in section VIII (Rule 2201 Compliance), these units are not subject to Rule 2201, therefore, it is only necessary to determine the daily post modification and the annual pre and post modification emission rates. The daily emission rates are required for completion of the daily emissions field of the Permit Administration System (PAS) Emission Profile and the annual emission rates are required for completion of the quarterly Increase in Permitted Emissions (IPE) and annual emission rate fields of the PAS Emission Profile.

N-3386-2:

Except for CO, the premodification emission factors are from the current Permit to Operate. The current CO limit is 47 ppmvd @ 3% O₂ or 0.296 lb/MMBtu. Those emission factors are not equivalent.

Compliance with the emission limits of Rule 4306 was achieved by replacing the burner (Project 1050068). At the time of ATC issuance, low-NO_x tuning flexibility was provided for by increasing the CO limit from 0.035 lb/MMBtu (equivalent to 47 ppmvd @ 3% O₂) to 400 ppmvd @ 3% O₂ or 0.296 lb/MMBtu. Following the initial source test the appropriate CO limit was to be established and that limit placed on the PTO. The initial source test showed the CO emissions to be 1.2 ppmvd @ 3% O₂ and during the conversion of the ATC to a PTO, the CO limit was changed to 47 ppmvd @ 3% O₂ or 0.296 lb/MMBtu. As can be seen, these limits are not equivalent. It appears that the District intended to retain the previous CO emission limit of 0.035 lb/MMBtu and to add the 47 ppmvd equivalent to the condition. To correct this error, the CO limit will be administratively corrected to 47 ppmvd @ 3% O₂ or 0.035 lb/MMBtu at this time.

The post modification NO_x emission factor was proposed by the applicant. No change the CO, VOC, SO_x or PM₁₀ emission factors were proposed.

Pollutant	Premodification	Postmodification
NO _x	15 ppmvd @ 3% O ₂ (0.018 lb/MMBtu)	9 ppmvd @ 3% O ₂ or 0.011 lb/MMBtu
CO	47 ppmvd @ 3% O ₂ (0.035 lb/MMBtu)	47 ppmvd @ 3% O ₂ or 0.035 lb/MMBtu
VOC	0.0027 lb/MMBtu	0.0027 lb/MMBtu
SO _x	0.00285 lb/MMBtu	0.00285 lb/MMBtu
PM ₁₀	0.014 lb/MMBtu	0.014 lb/MMBtu

N-3386-3:

The premodification emission factors are from the current Permit to Operate. The post modification NOx emission factor was proposed by the applicant. No change the CO, VOC, SOx or PM10 emission factors were proposed.

Pollutant	Premodification	Postmodification
NOx	15 ppmvd @ 3% O ₂ (0.018 lb/MMBtu)	9 ppmvd @ 3% O ₂ or 0.011 lb/MMBtu
CO	30 ppmvd @ 3% O ₂ (0.022 lb/MMBtu)	30 ppmvd @ 3% O ₂ or 0.022 lb/MMBtu
VOC	6.8 ppmvd @ 3% O ₂ (0.00287 lb/MMBtu)	0.00287 lb/MMBtu
SOx	0.00285 lb/MMBtu	0.00285 lb/MMBtu
PM10	0.0076 lb/MMBtu	0.0076 lb/MMBtu

C. Potential to Emit (PE)

1. Potential to Emit

Premodification Potentials to Emit:

Except for CO, the potentials to emit for unit N-3386-2-7 is from the Application Review document for project N-1050068. In that Application Review, the incorrect CO emission factor of 0.296 lb/MMBtu was used to calculate the PE. Since the CO factor is being corrected, the PE of CO must be recalculated.

$$PE_{CO} \text{ (daily)} = (10.463 \text{ lb/MMBtu})(0.035 \text{ lb/MMBtu})(24 \text{ hr/day}) = 8.8 \text{ lb/day}$$
$$PE_{CO} \text{ (annual)} = (30 \times 10^9 \text{ MMBtu/yr})(0.035 \text{ lb/MMBtu}) = 1,050 \text{ lb/yr}$$

The potential to emit for unit N-3386-3-6 is from the Application Review document for project N-1041120.

Pollutant	Annual Potential to Emit (lb)	
	N-3386-2-7	N-3386-3-6
NOx	540	1,609
CO	1,050	1,967
VOC	81	259
SOx	86	255
PM10	420	679

Postmodification Potentials to Emit:

Only the NOx emissions will change, therefore, only the NOx emissions need be recalculated. The premodification and postmodification emissions of CO, VOC, SOx and PM10 are equal.

The PE's of VOC, SOx and PM10 from permit unit N-3386-2-7 are from the Application Review document for project N-1050068. The PE of CO is as calculated in the premodification PE section above.

The potentials to emit of CO, VOC, SOx and PM10 from permit unit N-3386-3-6 are from the Application Review document for project N-1041120.

N-3386-2-8:

Boiler Rating: 10.463 MMBtu/hr
 Fuel Use Limit: 30×10^9 Btu/yr (current PTO)
 EF_{NOx}: 0.011 lb/MMBtu

PE_{NOx} (daily) = (10.463 MMBtu/hr)(0.011 lb/MMBtu)(24 hr/day) = 2.8 lb/day
 PE_{NOx} (annual) = (30×10^9 Btu/yr)(0.011 lb/MMBtu) = 330 lb/yr

Pollutant	PE (lb/day)	PE (lb/yr)
CO	8.8	1,050
VOC	0.7	81
SOx	0.7	86
PM10	3.5	420

N-3386-3-7:

Boiler Rating: 10.2058 MMBtu/hr
 Fuel Use Limit: None
 EF_{NOx}: 0.011 lb/MMBtu

PE_{NOx} (daily) = (10.2058 MMBtu/hr)(0.011 lb/MMBtu)(24 hr/day) = 2.7 lb/day
 PE_{NOx} (annual) = (10.2058 MMBtu/hr)(0.011 lb/MMBtu)(8,760 hr/yr) = 983 lb/yr

Pollutant	PE (lb/day)	PE (lb/yr)
CO	5.4	1,967
VOC	0.7	259
SOx	0.7	255
PM10	1.9	679

D. Increase in Permitted Emissions (IPE)

1. Quarterly IPE

N-3386-2-8:

$$\text{IPE}_{\text{NOx}} = 330 \text{ lb/yr} - 540 \text{ lb/yr} = -210 \text{ lb/yr} (-52.5 \text{ lb/qtr})$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	330	86	420	1,050	81
Daily PE	2.8	0.7	3.5	8.8	0.7
Δ PE (Qtr 1)	-52	0	0	0	0
Δ PE (Qtr 2)	-52	0	0	0	0
Δ PE (Qtr 3)	-53	0	0	0	0
Δ PE (Qtr 4)	-53	0	0	0	0

N-3386-3-7:

$$\text{IPE}_{\text{NOx}} = 983 \text{ lb/yr} - 1,609 \text{ lb/yr} = -626 \text{ lb/yr} (-156.5 \text{ lb/qtr})$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	983	255	679	1,967	259
Daily PE	2.7	0.7	1.9	5.4	0.7
Δ PE (Qtr 1)	-156	0	0	0	0
Δ PE (Qtr 2)	-156	0	0	0	0
Δ PE (Qtr 3)	-157	0	0	0	0
Δ PE (Qtr 4)	-157	0	0	0	0

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

On May 9, 2011, the units were source tested to determine the NOx and CO emissions. The tests showed that the NOx and CO emissions from unit N-3386-2 were 6.88 ppmvd @ 3% O₂ and 5.94 ppmvd @ 3% O₂ respectively and the NOx and CO emissions from unit N-3386-3 were 7.07 ppmvd @ 3% O₂ and 10.98 ppmvd @ 3% O₂ respectively. Since the applicant is not proposing any increases in permitted emissions and compliance with the proposed limits has already been demonstrated, this permitting action is not subject to Rule 2201 per District guidance document FYI-111 (Case 5).

Rule 2520 Federally Mandated Operating Permits

The facility is proposing to receive Authorities to Construct to lower the NOx emissions of the boilers for compliance with District Rule 4320. Such a modification is a Minor Modification to the facility Title V permit.

The applicant has proposed to receive the Authorities to Construct with Certificates of Conformity. Prior to operating under these ATC's, the facility will be required to submit an application for an Administrative Amendment to the Title V permit. The Authority to Construct will include the following conditions:

{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

The permittee may construct or modify the equipment as authorized by this Authority to Construct at this time. Prior to operating with the modifications authorized by this Authority to Construct, the District shall receive an application for an Administrative Permit Amendment. [District Rule 2520, 5.3.4] Y

Rule 4001 New Source Performance Standards

40 CFR Part 60 Subpart Dc:

This subpart applies to the units rated at 100 MMBtu/hr or less but greater than or equal to 10 MMBtu/hr. This units currently under consideration fall into this category and are therefore subject units.

Emission Standards:

SOx Emission Standard:

Section 60.42c applies only to units that combust coal or oil. The subject unit does not burn these fuels, therefore, this subpart does not apply.

Particulate Matter Emission Standard:

Section 60.43c applies only to units that combust coal, wood or oil. The subject unit does not burn these fuels, therefore, this subpart does not apply.

Compliance Testing:

SOx Compliance Testing:

This subpart does not include a SOx standard to test for compliance with, therefore, SOx testing is not required.

Particulate Matter Testing:

This subpart does not include a particulate matter standard to test for compliance with, therefore, particulate matter testing is not required.

Emission Monitoring:

The subject unit is not subject to the section 60.42(c) SOx limit or the 60.43(c) PM10 limit of this subpart. Therefore, monitoring is not required.

Reporting and Record Keeping:

Section 60.48c(a) states that the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

The design heat input capacity and type of fuel combusted at the facility will be listed on the unit's equipment description. No conditions are required to ensure compliance with this requirement.

- (2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel mixture of fuels under §60.42c or §40.43c.

This requirement is not applicable since the unit is not subject to §60.42c or §40.43c.

- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

Unit N-3386-2:

The facility has proposed an annual capacity factor limit; therefore the permit will limit the fuel usage accordingly. The permit will require that the fuel usage records necessary to verify compliance with this rule be kept and that they be provided to the District upon request.

Unit N-3386-3:

The facility has not proposed an annual capacity factor for this unit.

- (4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

This requirement is not applicable since the unit will not be equipped with an emerging technology used to control SO₂ emissions.

Section 60.48c(g) requires that the owner or operator of each affected facility record and maintain records of the amount daily amount of fuel combusted unless an applicable alternative is provided 60.48(g)(2) or 60.48(g)(3). Section 60.48(g)(2), which allows monthly records, applies because only natural gas will be burned. Therefore, monthly fuel usage records will be required.

Section 60.48c(i) states that all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. District Rule 4320 requires that records be kept for five years.

Rule 4101 Visible Emissions

As long as the equipment is properly maintained and operated, the visible emissions are not expected to exceed 20% opacity for a period or periods aggregating more than 3 minutes in any one hour. Compliance with the provisions of this rule is expected.

Rule 4102 Nuisance

A. California Health & Safety Code 41700 (Health Risk Analysis)

There will not be an increase in fuel usage or in toxic emissions. Therefore, a health risk assessment is not required.

B. Toxics BACT (T-BACT)

There will not be an increase in fuel usage or in toxic emissions. Therefore, Toxics BACT is not required.

Rule 4201 Particulate Matter Concentration

This rule limits the particulate matter emission concentration to 0.1 gr/dscf of exhaust flow.

N-3386-2:

Compliance with this rule was determined during the processing of project N-1050068 and no changes that would affect that determination are being made. Therefore, continued compliance is expected.

N-3386-3:

Compliance with this rule was determined during the processing of project N-1041120 and no changes that would affect that determination are being made. Therefore, continued compliance is expected.

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

The NO_x, CO and O₂ concentrations are periodically measured in accordance with Scheme A of District Policy SSP 1105. Per section 6.3.1.2 of Rule 4230, tune-ups are not required for this unit.

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

The boiler heat input rating is greater than 5.0 MMBtu/hr and it is therefore subject to this rule. However, it is also subject to District Rule 4320 (Advanced Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5.0 MMBtu/hr). Since the Rule 4320 requirements are equivalent to, or more stringent than District Rule 4305 requirements, compliance with Rule 4320 will result in compliance with District Rule 4305 also. Compliance with District Rule 4305 is expected.

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

The boiler heat input rating is greater than 5.0 MMBtu/hr and it is therefore subject to this rule. However, it is also subject to District Rule 4320 (Advanced Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5.0 MMBtu/hr). Since the Rule 4320 requirements are equivalent to, or more stringent than District Rule 4306 requirements, compliance with Rule 4320 will result in compliance with District Rule 4306 also. Compliance with District Rule 4306 is expected.

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 natural gas fired process heater rated at more than 5.0 MMBtu/hr, therefore, it is subject to this rule.

Emission Limits:

NOx Limit:

The unit is rated at less than 20 MMBtu/hr and is therefore subject to the Category A NOx emission limit of Table 1. That limit is 9 ppmvd @ 3% O₂ or 0.011 lb/MMBtu. The applicant is proposing to limit the NOx emissions to 9 ppmvd @ 3% O₂ or 0.011 lb/MMBtu. 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% O₂. The applicant is proposing CO limits of less than this, therefore, compliance with the CO emission limit of this rule is expected.

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 a 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 PUC quality natural gas, therefore compliance with the particulate matter control requirement of this rule is expected.

Monitoring:

NOx, CO and O₂ 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 NOx, CO and O₂, or to conduct alternate District approved monitoring.

To satisfy the applicable monitoring requirements, the applicant is proposing to continue with the periodic monitoring of the NOx, CO and O₂ levels utilizing a District approved portable analyzer (as allowed by Scheme A of District Policy SSP-1105).

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 other methods of showing compliance with the SOx emission monitoring requirement. The following condition will be included on the ATC and the PTO:

{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]

Record Keeping:

Section 6.1.3 also requires the operator to monitor relevant operational characteristics of the units to ensure that the emission limits of section 5.2 are met during 36-month source testing intervals. The necessary monitoring will be required.

Section 6.1.4 requires that records of the duration of each start-up and shut-down period be kept. Since no emission limit allowances are being proposed or granted for start-up and shutdown events, these records are not 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 a requirement will be placed on the Authority to Construct and the Permit to Operate (PTO).

Source Testing:

Section 6.3.1 of this rule requires that 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.

The units were shown by the most recent source tests to comply with the NOx and CO limits that will be placed on the proposed ATC's and PTO's. Therefore, initial testing is not required and the source testing may continue on its current schedule.

Tune-ups:

Section 6.3.1.1 requires that during each 36-month source testing interval, the unit be tuned in accordance with the provisions of section 5.5.1 of this rule. However, per section 6.3.1.2, the tune-ups are not required if the permittee maintains a CEMS or an APCO approved Alternate Monitoring System where the emissions are periodically monitored. The applicant will be monitoring the stack NO_x, CO and O₂ in accordance with Scheme A of District Policy SSP-1105, therefore, tune-ups are not required.

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

This rule applies to boilers, steam generators and process heaters that are rated at or above 5 MMBtu/hr and are located at Major Sources of NO_x. As shown in section VII.F of this document, the facility is not a Major Source for NO_x. This rule does not apply.

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 equipment will not be located within 1,000 feet of a K-12 school, therefore, a school notice is not required.

IX. Recommendation

Issue Authorities to Construct with the conditions on the attached Draft Authorities to Construct.

Permit N-3386-3-6 includes the following condition. Rule 4305 does not require hhv testing and as shown in section VIII (Rule 4351 Compliance), Rule 4351 does not apply to this unit. Therefore, it is recommended that the condition be removed.

Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Y

Permit N-3386-3-6 includes the following condition. However, as shown in section VIII (Rule 4351 Compliance), Rule 4351 does not apply to this unit. Therefore, it is recommended that reference to Rule 4351 be removed.

Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201, 4305, and 4351. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Y

X. Billing Information

Premodification:

Permit #	Description	Fee Schedule
N-3386-2-7	10.463 MMBtu/hr	3020-2-G
N-3386-3-6	10.2058 MMBtu/hr	3020-2-G

Post modification:

No Change

Appendices

Appendix A: Draft ATC's

Appendix B: Current PTO's

Appendix C: Major Source Calculations

Appendix A Draft ATC's

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-3386-2-8

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: 600 YOSEMITE BLVD
MODESTO, CA 95354

LOCATION: 600 YOSEMITE BLVD
MODESTO, CA 95353

EQUIPMENT DESCRIPTION:

10.463 MMBTU/HR KEWANEE MODEL #L2S-250-G02 NATURAL GAS-FIRED BOILER WITH A CLEAVER-BROOKS MODEL NTH105NGX-F9R BURNER AND FLUE GAS RECIRCULATION (BOILER #2). MODIFICATION TO LIMIT THE NOX EMISSIONS TO 9 PPMVD @ 3% O2 FOR RULE 4320 COMPLIANCE.

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. The permittee may construct or modify the equipment as authorized by this Authority to Construct at this time. Prior to operating with the modifications authorized by this Authority to Construct, the District shall receive an application for an Administrative Permit Amendment. [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. 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] Federally Enforceable Through Title V Permit
5. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District NSR Rule and District Rules 4305 and 4306, 5.4.4] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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

DRAFT

DAVID WARNER, Director of Permit Services
N-3386-2-8 : Nov 28 2011 3:58PM - ECHOFORM - Joint Inspection NOT Required

7. The unit shall only be fired on PUC quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The annual heat input into this unit shall not exceed 30 billion Btu per calendar year. [District NSR Rule and District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
9. The NO_x emissions shall not exceed 9 ppmvd @ 3% O₂ or 0.011 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
10. The CO emissions shall not exceed 47 ppmvd @ 3% O₂ or 0.035 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. The VOC emissions shall not exceed 0.0027 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The PM₁₀ emissions shall not exceed 0.014 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. 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
17. 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
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. 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
20. 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
21. 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
22. 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 rules 4305, 4306 and 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

DRAFT
CONDITIONS CONTINUE ON NEXT PAGE

24. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
28. 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
29. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. Records of monthly and annual heat input of the unit shall be maintained. [District NSR Rule and District Rules 4305, 4306, 4320 and 40 CFR Part 60.48(g)(2)] Federally Enforceable Through Title V Permit
31. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-3386-3-7

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: 600 YOSEMITE BLVD
MODESTO, CA 95354

LOCATION: 600 YOSEMITE BLVD
MODESTO, CA 95353

EQUIPMENT DESCRIPTION:

10.2058 MMBTU/HR CLEAVER-BROOKS MODEL CB200-250 NATURAL GAS-FIRED BOILER WITH A CLEAVER-BROOKS/NATCOM MODEL NT1250 LOW NOX BURNER (BOILER #3). MODIFICATION TO LIMIT THE NOX EMISSIONS TO 9 PPMVD @ 3% O2 FOR RULE 4320 COMPLIANCE.

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. The permittee may construct or modify the equipment as authorized by this Authority to Construct at this time. Prior to operating with the modifications authorized by this Authority to Construct, the District shall receive an application for an Administrative Permit Amendment. [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. 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] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
6. {450} 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 Rule 4201 and District Rule 4301, 5.1 and 5.2.3] 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

DRAFT

DAVID WARNER, Director of Permit Services
N-3386-3-7 : Nov 28 2011 3:56PM - SCHOINHOM : Joint Inspection NOT Required.

7. The unit shall only be fired on PUC quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The NO_x emissions shall not exceed 9 ppmvd @ 3% O₂ or 0.011 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. The CO emissions shall not exceed 30 ppmvd @ 3% O₂ or 0.022 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
10. The VOC emissions shall not exceed 0.00287 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The PM₁₀ emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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 and 4306] Federally Enforceable Through Title V Permit
14. 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

Appendix B
Current PTO's

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3386-2-7

EXPIRATION DATE: 10/31/2014

EQUIPMENT DESCRIPTION:

10.463 MMBTU/HR KEWANEE MODEL #L2S-250-G02 NATURAL GAS-FIRED BOILER (#2) WITH A CLEAVER-BROOKS MODEL NTH105NGX-F9R BURNER AND FLUE GAS RECIRCULATION

PERMIT UNIT REQUIREMENTS

1. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District NSR Rule and District Rules 4305 and 4306, 5.4.4] Federally Enforceable Through Title V Permit
2. Maximum annual heat input of the unit shall not exceed 30 billion Btu per calendar year. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. The unit shall only be fired on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu, 47 ppmvd CO @ 3% O2 or 0.296 lb-CO/MMBtu, or 0.0027 lb-VOC/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
6. Source testing to measure natural gas-combustion NOx 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 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
7. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
8. 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 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
10. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit
11. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit

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

12. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit
13. 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
14. 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 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
15. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
16. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
17. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306, 5.5.4] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records; and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
19. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Records of monthly and annual heat input of the unit shall be maintained. [District NSR Rule and District Rules 4305 and 4306, 6.1.2] Federally Enforceable Through Title V Permit
22. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306, 6.1] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3386-3-6

EXPIRATION DATE: 10/31/2014

EQUIPMENT DESCRIPTION:

10.2058 MMBTU/HR CLEAVER-BROOKS MODEL CB200-250 NATURAL GAS-FIRED BOILER WITH A CLEAVER-BROOKS/NATCOM MODEL NT1250 LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

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 NSR Rule] Federally Enforceable Through Title V Permit
2. 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 Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 15.0 ppmvd NO_x @ 3% O₂ or 0.0182 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 30 ppmvd CO @ 3% O₂ or 0.022 lb-CO/MMBtu, or 6.8 ppmvd VOC @ 3% O₂ or 0.00287 lb-VOC/MMBtu. [District NSR Rule and Rules 4305, and 4306] Federally Enforceable Through Title V Permit
5. 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 and 4306] Federally Enforceable Through Title V Permit
6. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
7. 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 and 4306] Federally Enforceable Through Title V Permit
8. 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 and 4306] Federally Enforceable Through Title V Permit
9. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
10. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] 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.

11. 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 (10/16/08). [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
12. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 2520 9.3.2] Federally Enforceable Through Title V Permit
13. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 2520 9.3.2] Federally Enforceable Through Title V Permit
14. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 2520 9.3.2] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 2520 9.4.2] Federally Enforceable Through Title V Permit
16. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081 (12/16/93). [District Rule 1081] Federally Enforceable Through Title V Permit
17. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
18. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201, 4305, and 4351. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule Rule 1081. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
23. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
24. 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 2520.9.4.2] Federally Enforceable Through Title V Permit

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

Appendix C

Major Source Calculations

Permit	NO _x	CO	VOC	SO _x	PM10
N-3386-1-9	1,022	21,024	256	256	1,278
N-3386-2-7	1,650	27,130	247	261	1,283
N-3386-3-6	1,627	1,967	257	255	679
N-3386-5-3	0	0	0	0	3,696
N-3386-6-3	0	0	0	0	105
N-3386-10-3	0	0	861	0	0
N-3386-11-6	990	16,284	149	157	660
N-3386-13-3	0	0	0	0	0
N-3386-16-3	0	0	0	0	0
N-3386-17-3	0	0	0	0	0
N-3386-18-3	0	0	0	0	0
N-3386-19-3	0	0	0	0	0
N-3386-23-6	107	135	16	0	6
N-3386-24-4	0	0	569	0	0
N-3386-26-3	89	64	24	0	3
N-3386-27-2	710	74	32	1	11
N-3386-28-4	324	185	49	0	15
N-3386-29-3	3,499	233	10	5	81
N-3386-30-1	0	0	0	0	0
N-3386-31-1	0	0	0	0	0
N-3386-33-1 thru '467-1	0	0	32,082	0	0
N-3386-469-2	0	0	633	0	225
N-3386-470-1	0	0		0	0
N-3386-471-1	0	0		0	0
N-3386-472-1	0	0		0	0
N-3386-473-1	0	0	532	0	0
N-3386-474-0	0	0	0	0	613
N-3386-475-0	0	0	0	0	64,509
N-3386-476-0	0	0	133	0	0
N-3386-477-0	0	0	133	0	0
N-3386-478-0	0	0	133	0	0
N-3386-479-0	0	0	133	0	0
N-3386-480-0	0	0	133	0	0
N-3386-481-0	0	0	133	0	0
N-3386-482-0	0	0	133	0	0
N-3386-483-0	0	0	133	0	0
N-7478-1-2	2,628	2,208	89,556	75	200
N-7478-2-1	3,504	2,943	123,271	100	266
N-7478-3-0	0	0	3,978	0	0
N-7478-4-0	471	70	32	1	7
Total	16,621	72,317	253,618	1,111	73,637

Per permit N-3386-0, facilities N-3386 and N-7478 are the same Stationary Source
N-3386-1 through N-3386-468 – Application Review document for project N-1094803
N-7478-1 through N-7478-4 – Application Review document for project N-1094803
N-3386-470 through N-3386-473 – Application Review document for project N-1111823
N-3386-474 & N-3386-475 – Application Review document for project N-1111118
N-3386-476 through N-3386-483 – Application Review document for project N-1111273