



OCT 30 2013

Mr. Jeff Schultz
ConAgra Foods
554 S Yosemite Ave
Oakdale, CA 95361

Re: Notice of Minor Title V Permit Modification
District Facility # N-1976
Project # N-1133330

Dear Mr. Schultz:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct permit N-1976-28-0 into the Title V operating permit. The proposed project was to install a 99.9 MMBtu/hr natural gas-fired rental boiler as temporary replacement emission unit (TREU) for the boilers permitted under N-1976-4, '-6 and '-26.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct permit N-1976-28-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

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

Title V APPLICATION REVIEW Minor Modification

Facility Number: N-1976
Facility Name: ConAgra Foods
Mailing Address: 554 S. Yosemite Ave
Oakdale, CA 95361

Contact Name: Jeff Schultz
Phone: (209) 840-1146
Fax: (209) 848-7387

Responsible Official: Jeff Schultz
Title: Plant Engineering and Environmental Manager

Processing Staff: Jag Kahlon
Project Number: N-1133330
Date: October 24, 2013

I. PROPOSAL

ConAgra Foods has proposed to incorporate Authority to Construct (ATC) permit N-1976-28-0 into their Title V operating permit. The ATC permit was issued without Certificate of Conformity (COC). The proposed project was to install a 99.9 MMBtu/hr natural gas-fired rental boiler as temporary replacement emission unit (TREU) for the boilers permitted under N-1976-4, '-6 and '-26.

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

II. FACILITY LOCATION

This facility is located at 554 S. Yosemite Ave, Oakdale, California.

III. EQUIPMENT DESCRIPTION

N-1976-28-1:
99.9 MMBTU/HR NEBRASKA MODEL NOS-2A/S-64 NATURAL GAS-FIRED BOILER WITH A TODD MODEL VARIFLAME LOW NOX BURNER SERVED BY A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM OR EQUIVALENT - TEMPORARY REPLACEMENT EMISSION UNIT FOR THE BOILERS PERMITTED UNDER N-1976-4, '-6, AND '-26)

IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification to the Title V permit because the applicant is not proposing to relax any monitoring, recordkeeping, or reporting requirements as a part of the project and the project was not an SB-288 or a Federal Major Modification under Rule 2201. Therefore, public review is not required.

V. APPLICABLE REQUIREMENTS

Rule 2520 Federally Mandated Operating Permits (6/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

As stated previously, the proposed rental boiler was permitted as a TREU for the primary boilers under permits N-1976-4, '-6 and '-26.

Emissions limits, monitoring and recordkeeping requirements established in ATC permit N-1976-28-0 are equivalent or more stringent than that of the permits N-1976-4-9, '-6-8 and '-26-0. The annual testing requirements are not included in permit N-1976-28-0 since the rental boiler is required to be removed within 180 days of initial startup date.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and

- b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix III).

Compliance is expected with this Rule.

APPENDICES

Appendix I: Proposed Title V Operating Permit No. N-1976-28-1

Appendix II: Authority to Construct N-1976-28-0

Appendix III: Permit Application

Appendix IV: Emissions Change

Appendix V: Title V Permits to Operate N-1976-4-9, '-6-8 and '-26-1 (draft in-notice)

Appendix I
Proposed Title V Operating Permit No. N-1976-28-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1976-28-1

EXPIRATION DATE: 07/31/2017

EQUIPMENT DESCRIPTION:

99.9 MMBTU/HR NEBRASKA MODEL NOS-2A/S-64 NATURAL GAS-FIRED BOILER WITH A TODD MODEL VARIFLAME LOW NOX BURNER SERVED BY A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM OR EQUIVALENT - TEMPORARY REPLACEMENT EMISSION UNIT FOR THE BOILERS PERMITTED UNDER N-1976-4, '-6, AND '-26)

PERMIT UNIT REQUIREMENTS

1. This unit shall only be operated when the boiler under permit N-1976-6 and/or N-1976-4 (or shutdown of the temporary burner for N-1976-4 authorized under permit N-1976-26) is shutdown for maintenance or repair. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
2. This unit shall be removed from the site within 180 days of the initial startup date. The permittee shall keep records of the initial startup date of this rental unit. [District Rule 2201] Federally Enforceable Through Title V Permit
3. During shutdown of the boiler under permit N-1976-4 (or shutdown of the temporary burner for N-1976-4 authorized under permit N-1976-26), the combined time at the site for the temporary burner and the rental boiler shall not exceed a total of 180 days in any 12-month period. The permittee shall keep records of the date when shutdown of N-1976-4 (or shutdown of the temporary burner for N-1976-4 authorized under permit N-1976-26) occurs. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. The total duration of startup and shutdown events shall not exceed 4.0 hours in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The total duration of startup and shutdown events shall not exceed 40 hours per year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The duration of each startup or each shutdown shall not exceed 2.0 hours. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
10. During startup and shutdown, NOx emissions shall not exceed 30.0 ppmvd @ 3% O2 or 0.036 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. During startup and shutdown, CO emissions 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
12. Except during startup and shutdown, NOx emissions shall not exceed 5.0 ppmvd @ 3% O2 or 0.008 lb/MMBtu, referenced as NO2. [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.

13. Except during startup and shutdown, CO emissions shall not exceed 50 ppmvd @ 3% O₂ or 0.037 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM₁₀ emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. VOC emissions shall not exceed 0.001 lb/MMBtu, referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
17. NH₃ emissions from the SCR system shall not exceed 10 ppmvd @ 3% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ within 7 days of initial startup of the unit and at least once during each month thereafter. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH₃ monitoring shall be conducted utilizing gas detection tubes (Draeger brand or District approved equivalent). 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 it has been performed within the last month. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. If either the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a portable analyzer test within 7 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. 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 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. All NO_x, CO, O₂ and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. Ammonia emissions readings shall be conducted at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of the date, startup duration, and shutdown duration. [District Rule 2201] 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, 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.

25. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010] Federally Enforceable Through Title V Permit
27. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
28. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or increase in firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit

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

DRAFT

Appendix II
Authority to Construct N-1976-28-0



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1976-28-0

ISSUANCE DATE: 08/30/2013

LEGAL OWNER OR OPERATOR: CONAGRA FOODS
MAILING ADDRESS: 554 S YOSEMITE AVE
OAKDALE, CA 95361

LOCATION: 554 S YOSEMITE AVE
OAKDALE, CA 95361

EQUIPMENT DESCRIPTION:
99.9 MMBTU/HR NEBRASKA MODEL NOS-2A/S-64 NATURAL GAS-FIRED BOILER WITH A TODD MODEL VARIFLAME LOW NOX BURNER SERVED BY A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM OR EQUIVALENT - TEMPORARY REPLACEMENT EMISSION UNIT FOR THE BOILERS PERMITTED UNDER N-1976-4, '-6, AND '-26)

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. This unit shall only be operated when the boiler under permit N-1976-6 and/or N-1976-4 (or shutdown of the temporary burner for N-1976-4 authorized under permit N-1976-26) is shutdown for maintenance or repair. [District Rules 2201 and 4102]
3. This unit shall be removed from the site within 180 days of the initial startup date. The permittee shall keep records of the initial startup date of this rental unit. [District Rule 2201]
4. During shutdown of the boiler under permit N-1976-4 (or shutdown of the temporary burner for N-1976-4 authorized under permit N-1976-26), the combined time at the site for the temporary burner and the rental boiler shall not exceed a total of 180 days in any 12-month period. The permittee shall keep records of the date when shutdown of N-1976-4 (or shutdown of the temporary burner for N-1976-4 authorized under permit N-1976-26) occurs. [District Rule 2201]
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
7. 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]

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


DAVID WARNER, Director of Permit Services

N-1976-28-0 Aug 30 2013 1:35PM - KAHLOUJ Joint Inspection NOT Required

8. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]
9. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320]
10. The total duration of startup and shutdown events shall not exceed 4.0 hours in any one day. [District Rule 2201]
11. The total duration of startup and shutdown events shall not exceed 40 hours per year. [District Rule 2201]
12. The duration of each startup or each shutdown shall not exceed 2.0 hours. [District Rules 4306 and 4320]
13. During startup and shutdown, NO_x emissions shall not exceed 30.0 ppmvd @ 3% O₂ or 0.036 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
14. During startup and shutdown, CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
15. Except during startup and shutdown, NO_x emissions shall not exceed 5.0 ppmvd @ 3% O₂ or 0.008 lb/MMBtu, referenced as NO₂. [District Rules 2201, 4306 and 4320]
16. Except during startup and shutdown, CO emissions shall not exceed 50 ppmvd @ 3% O₂ or 0.037 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320]
17. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
18. PM₁₀ emissions shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
19. VOC emissions shall not exceed 0.001 lb/MMBtu, referenced as methane. [District Rule 2201]
20. NH₃ emissions from the SCR system shall not exceed 10 ppmvd @ 3% O₂. [District Rule 2201]
21. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ within 7 days of initial startup of the unit and at least once during each month thereafter. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH₃ monitoring shall be conducted utilizing gas detection tubes (Draeger brand or District approved equivalent). 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 it has been performed within the last month. [District Rules 2201, 4305, 4306 and 4320]
22. If either the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a portable analyzer test within 7 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. 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 2201, 4305, 4306 and 4320]
23. All NO_x, CO, O₂ and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 2201, 4305, 4306 and 4320]
24. Ammonia emissions readings shall be conducted at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 2201, 4305, 4306 and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

25. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306 and 4320]
26. The permittee shall maintain records of the date, startup duration, and shutdown duration. [District Rule 2201]
27. 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]
28. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201]
29. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010]
30. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201]
31. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or increase in firing rate may be authorized for any alternate equipment. [District Rule 2201]

Appendix III
Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT
 MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>ConAgra Foods</u>	
2. MAILING ADDRESS:	
STREET/P.O. BOX: <u>554 S. Yosemite Avenue</u>	
CITY: <u>Oakdale</u> STATE: <u>CA</u>	9-DIGIT ZIP CODE: <u>95361</u>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	
STREET: <u>554 S. Yosemite Avenue</u> CITY: <u>Oakdale</u>	
<u>14</u> ¼ SECTION <u>T2S</u> TOWNSHIP <u>R10E</u> RANGE _____	
INSTALLATION DATE:	
4. GENERAL NATURE OF BUSINESS:	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>Include permit no N-1976-28-0 into the current Title V permit.</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Jeff Schultz</u>	TITLE OF APPLICANT: <u>Plant Engg & Env Manager</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>10/1/13</u>
	PHONE: <u>(209) 840-1146</u> FAX: <u>(209) 848-7387</u> EMAIL:

jeff.schultz@conagrafoods.com

<p>For APCD Use Only:</p> <p style="text-align: center; font-weight: bold; font-size: 1.2em;">RECEIVED</p> <p>DATE STAMP <u>OCT 21 2013</u></p> <p style="text-align: center;">SJVAPCD NORTHERN REGION</p>	<p style="text-align: center; font-size: 1.2em; font-weight: bold;">Conestoga-Rovers + Assoc.</p> <p>FILING FEE RECEIVED: \$ <u>57.00</u> CHECK#: <u>11607</u></p> <p>DATE PAID: <u>10/17/13</u></p> <p>PROJECT NO: <u>N1133330</u> FACILITY ID: <u>N-1976</u></p>
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Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

**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
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: ConAgra Foods	FACILITY ID: N - 1976
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: ConAgra Foods	
3. Agent to the Owner:	

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:

Jeff Schultz
 Signature of Responsible Official

10/1/13
 Date

Jeff Schultz
 Name of Responsible Official (please print)

Plant Engg & Env Manager
 Title of Responsible Official (please print)

Appendix IV
Emissions Change

Emissions Change

Emissions change under ATC project that resulted in ATC N-1976-28-0 is summarized in the following table.

Emissions Change			
Pollutant	Annual PE2 (lb/yr)	Annual PE1 (lb/yr)	Quarterly IPE (lb/qtr)
NOx	0	0	0
SOx	0	0	0
PM10	0	0	0
CO	0	0	0
VOC	0	0	0

Appendix V
Title V Permits to Operate N-1976-4-9, '-6-8 and '-26-1 (draft in-notice)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1976-4-9

EXPIRATION DATE: 07/31/2017

EQUIPMENT DESCRIPTION:

196 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER (#4) WITH A TODD MODEL RADIAN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR)

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 Rule 2201] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201, and 4320] Federally Enforceable Through Title V Permit
3. Natural gas usage for this boiler shall not exceed 943,272 MMBtu in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 9.0 ppmv NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.005 lb-PM₁₀/MMBtu, 50 ppmv CO @ 3% O₂ or 0.036 lb-CO/MMBtu, or 0.0014 lb-VOC/MMBtu. [District Rule 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
6. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
7. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be that for which compliance with applicable NO_x and CO emissions rates have been demonstrated through source testing at a similar firing rate. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
8. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
9. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. 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] 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.

10. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
12. 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
13. The source test 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
14. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
15. 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 4305 and 4306] Federally Enforceable Through Title V Permit
16. 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
17. 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
18. 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
19. 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
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 and 4306] 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] 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] Federally Enforceable Through Title V Permit
23. The permittee shall submit an Authority to Construct application to comply with the Table 1, Category B, NO_x Limit b of District Rule 4320 (adopted October 16, 2008) by January 1, 2013, and shall be in compliance with the rule by January 1, 2014. [District Rule 4320] 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-1976-6-8

EXPIRATION DATE: 07/31/2017

EQUIPMENT DESCRIPTION:

184 MMBTU/HR BABCOCK & WILCOX MODEL FM117-97 NATURAL GAS-FIRED BOILER #2 WITH A TODD RAPID MIX ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR)

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 Rule 2201] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201, 4301, and 4320] 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. This unit is subject to the requirements of 40 CFR Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. [District Rule 4001] Federally Enforceable Through Title V Permit
5. This unit shall comply with the emission monitoring requirements for nitrogen oxides given in 40 CFR Part 60.48b. [District Rule 4001] Federally Enforceable Through Title V Permit
6. Emission rates from the unit shall not exceed 0.10 lb-NO_x/MMBtu at any time, including periods of startup, shutdown, or malfunction. Compliance with this shall be determined by the EPA-approved alternate monitoring plan for this permit unit. [District Rule 4001 and 40 CFR 60.44b] Federally Enforceable Through Title V Permit
7. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 9.0 ppmvd NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.001 lb-VOC/MMBtu. [District Rule 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
8. The flue gas recirculation valve setting shall be monitored and recorded 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. [District Rules 4305, 4306, and 40 CFR 64] Federally Enforceable Through Title V Permit
9. The flue gas recirculation valve setting shall not be less than 61% at firing rates greater than 62%. [District Rules 4305, 4306, and 40 CFR 64] Federally Enforceable Through Title V Permit
10. Normal range or level for the flue gas recirculation valve settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 40 CFR 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.

11. If the flue gas recirculation valve setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. 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 40 CFR 64] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the date and time of flue gas recirculation valve settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve setting within the acceptable range. [District Rules 4305, 4306, and 40 CFR 64] Federally Enforceable Through Title V Permit
13. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306] Federally Enforceable Through Title V Permit
14. 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 Rule 4306] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. 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
17. The source test 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
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 and 4306] 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 and 4306] 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 and 4306] Federally Enforceable Through Title V Permit
22. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
24. 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] Federally Enforceable Through Title V Permit
25. The permittee shall submit an Authority to Construct application to comply with the Table 1, Category B, NOx Limit b of District Rule 4320 (adopted October 16, 2008) by January 1, 2013, and shall be in compliance with the rule by January 1, 2014. [District Rule 4320] 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-1976-26-1

EXPIRATION DATE: 07/31/2017

EQUIPMENT DESCRIPTION:

184 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER WITH A TODD MODEL RADIANT LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) - TEMPORARY REPLACEMENT EMISSION UNIT FOR THE BOILER PERMITTED UNDER N-1976-4

PERMIT UNIT REQUIREMENTS

1. The burner authorized under this permit shall be removed from the boiler N-1976-4 within 180 days of initial startup under this permit, or before January 1, 2014, whichever comes first. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter, or an equivalent technique to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
5. The total annual heat input to the primary (196 MMBtu/hr) and the temporary burners (184 MMBtu/hr) shall not exceed 943,272 MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. NOx emissions shall not exceed 9.0 ppmvd @ 3% O2 (0.011 lb/MMBtu) referenced as NO2. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
7. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.005 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
9. CO emissions shall not exceed 50 ppmvd @ 3% O2 (0.037 lb/MMBtu). [District Rules 2201, 4305, 4306] Federally Enforceable Through Title V Permit
10. VOC emissions shall not exceed 0.0014 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The acceptable settings for the flue gas recirculation valve(s) shall be established within 7 days of startup of the unit using a portable analyzer that meets District specification. The normal range/level shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through portable analyzer testing at a similar firing rate. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
12. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly 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. [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.

13. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a portable analyzer test within 7 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. In lieu of conducting a portable analyzer 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 2201, 4305 and 4306] 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] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. Records of monthly and annual heat input of both primary and temporary burners shall be maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
17. 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] Federally Enforceable Through Title V Permit

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

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