



JAN 17 2014

Mr. Thomas Melead
Frito Lay, Inc
600 Garner Road
Modesto, CA 95209

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1919
Project # N-1140073**

Dear Mr. Melead:

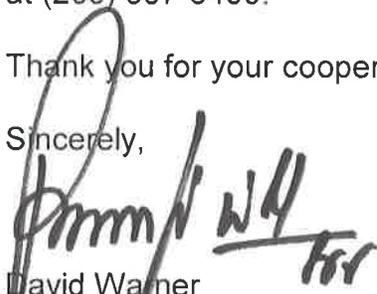
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct permit N-1919-1-8 into the Title V operating permit. The proposed project is to remove greenhouse gas (GHG) credit requirement, and correct the heat input rate of each oven from 1.9 MMBtu/hr to 3.2 MMBtu/hr in the equipment description.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct permit N-1919-1-8, 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-1919
Facility Name: Frito Lay, Inc.
Mailing Address: 600 Garner Road
Modesto, CA 95209

Contact Name: Thomas Melead
Phone: (209) 544-5466

Responsible Official: Thomas Melead
Title: Maintenance Engineering Director

Processing Staff: Jag Kahlon
Project Number: N-1140073
Date: January 8, 2014

I. PROPOSAL

Frito Lay, Inc has proposed to incorporate Authority to Construct (ATC) permit N-1919-1-8 into their Title V operating permit. The ATC permit was issued without Certificate of Conformity (COC). The proposed project was to remove greenhouse gas (GHG) credit requirement, and correct the heat input rate of each oven from 1.9 MMBtu/hr to 3.2 MMBtu/hr in the equipment description.

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 600 Garner Road, Modesto, California.

III. EQUIPMENT DESCRIPTION

N-1919-1-9:
LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 3.2 MMBTU/HR (EACH) OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER

IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification under Rule 2520 as 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

The proposed modifications are as follows:

Remove Condition #14 from PTO N-1919-1-7

“The permittee shall surrender 351 metric tons of CO2 equivalent greenhouse gas (GHG) credits each year from a District-approved source, at least 60 days prior to the anniversary date of first operation (3/26/12), until the permittee supplies permanent GHG reductions, or complies with District established Best Performance Standard (BPS). All credits surrendered shall be demonstrated by the submittal of documentation, on or before the deadlines discussed above, that proves the retirement of the credits. [California Environmental Quality Act]”

Under Authority to Construct (ATC) project N-1103895, Frito-Lay was required to mitigate 29% of GHG emissions due to an increase in heat input rate of two tortilla chips ovens that are fired on natural gas fuel. The mitigation was required to have a less than significant individual and cumulative impact on global climate change under CEQA.

For year 2011-2012, and 2012-2013, Frito-Lay had purchased carbon credits to demonstrate compliance with the required GHG mitigation.

Recently, it is discovered that GHG emissions caused by fuel-use are already mitigated by fuel suppliers under ARB's Cap-and-Trade regulation¹. Therefore, Frito-Lay is no longer required to purchase the carbon credits, and consequently, condition #14 is removed from the permit.

¹Refer to page 5 of District's draft policy titled "CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation (9/30/2013)"

Correct the heat input rate of each oven from 1.9 MMBtu/hr to 3.2 MMBtu/hr in the equipment description

During the issuance of the initial Title V permit, incorrect heat input value was included in the equipment description. This was corrected "administratively" as part of the ATC project. Note that heat input of each oven was appropriately increased from 1.9 to 3.2 MMBtu/hr under project N-1103895.

The equipment description is stated as follows:

LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 3.2 MMBTU/HR (EACH) OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER

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-1919-1-9
Appendix II:	Authority to Construct N-1919-1-8
Appendix III:	Permit Application
Appendix IV:	Emissions Change
Appendix V:	Title V Permit to Operate N-1919-1-7

Appendix I
Proposed Title V Operating Permit No. N-1919-1-9

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-1-9

EXPIRATION DATE: 10/31/2017

EQUIPMENT DESCRIPTION:

LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 3.2 MMBTU/HR (EACH) OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The ovens shall be fired primarily on natural gas fuel. LPG fuel shall only be used during periods of natural curtailment, and the use of LPG shall not exceed 384 hours in a calendar year. [District Rule 2201 and 4801] Federally Enforceable Through Title V Permit
3. The combustion equipment shall be equipped with a mass or volumetric fuel flow meter capable of measuring the natural gas and LPG fuel usages. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from natural gas combustion in each oven shall not exceed any of the following emission limits: 0.1 lb-NOx/MMBtu, 0.0029 lb-SOx/MMBtu, 0.012 lb-PM10/MMBtu, 0.47 lb-CO/MMBtu, and 0.0053 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from LPG fuel combustion in each oven shall not exceed any of the following emission limits: 14 lb-NOx/1,000 gal, 0.45 lb-SOx/1,000 gal, 0.40 lb-PM10/1,000 gal, 42.535 lb-CO/1,000 gal, and 0.47 lb-VOC/1,000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions from the fryer shall not exceed 7.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC emissions from the fryer shall not exceed 3.3 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the ambient air cooler shall not exceed 5.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59xP^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31xP^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. The high velocity air filter system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
11. The high velocity air filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Records of high velocity air filter system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] 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. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 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-1919-1-8



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1919-1-8

ISSUANCE DATE: 12/20/2013

LEGAL OWNER OR OPERATOR: FRITO-LAY INC
MAILING ADDRESS: 600 GARNER RD
MODESTO, CA 95357-0514

LOCATION: 600 GARNER RD
MODESTO, CA 95357-0514

EQUIPMENT DESCRIPTION:

MODIFICATION OF LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 1.9 MMBTU/HR OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER.: REMOVE GREENHOUSE GAS CREDIT REQUIREMENTS AND ADMINISTRATIVELY CORRECT THE HEAT INPUT RATE OF EACH OVEN TO 3.2 MMBTU/HR

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The ovens shall be fired primarily on natural gas fuel. LPG fuel shall only be used during periods of natural curtailment, and the use of LPG shall not exceed 384 hours in a calendar year. [District Rule 2201 and 4801] Federally Enforceable Through Title V Permit
6. The combustion equipment shall be equipped with a mass or volumetric fuel flow meter capable of measuring the natural gas and LPG fuel usages. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-8400 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-1919-1-8 : Dec 20 2013 11:57AM - KAHLONU : Joint Inspection NOT Required

7. Emissions from natural gas combustion in each oven shall not exceed any of the following emission limits: 0.1 lb-NO_x/MMBtu, 0.0029 lb-SO_x/MMBtu, 0.012 lb-PM₁₀/MMBtu, 0.47 lb-CO/MMBtu, and 0.0053 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from LPG fuel combustion in each oven shall not exceed any of the following emission limits: 14 lb-NO_x/1,000 gal, 0.45 lb-SO_x/1,000 gal, 0.40 lb-PM₁₀/1,000 gal, 42.535 lb-CO/1,000 gal, and 0.47 lb-VOC/1,000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM₁₀ emissions from the fryer shall not exceed 7.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC emissions from the fryer shall not exceed 3.3 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM₁₀ emissions from the ambient air cooler shall not exceed 5.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
13. The high velocity air filter system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
14. The high velocity air filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
15. Records of high velocity air filter system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

Appendix III
Permit Application



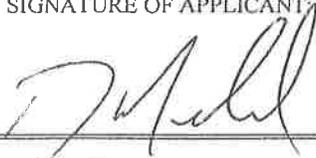
San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Frito Lay, Inc.	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>600 Garner Road</u> CITY: <u>Modesto</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95209</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>600 Garner Road</u> CITY: <u>Modesto</u> _____% SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Snack Food Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Incorporate ATC 1919-1-8 into Title V Permit	
6. TYPE OR PRINT NAME OF APPLICANT: Thomas Melead	TITLE OF APPLICANT: Maintenance/Engineering Director
7. SIGNATURE OF APPLICANT: 	DATE: <u>12-20-13</u> PHONE: (209) 544.5466 FAX: (209) 544.8702 EMAIL: Thomas.mlead@pepsico.com

For APCD Use Only: RECEIVED

DATE STAMP DEC 21 2013 SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>N1140073</u> FACILITY ID: <u>N-1919</u>
---	--



San Joaquin Valley Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

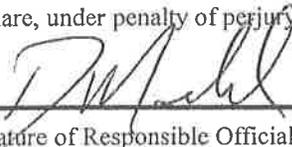
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Frito Lay Inc.	FACILITY ID: N-1919
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:	
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:


 Signature of Responsible Official

12.20.2013
 Date

Thomas Melead
 Name of Responsible Official (please print)

Maintenance Engineering Director
 Title of Responsible Official (please print)

Appendix IV
Emissions Change

Emissions Change

Emissions change under ATC project that resulted in ATC N-1919-1-8 is summarized in the following table.

Emissions Change			
Pollutant	Annual PE2 (lb/yr)	Annual PE1 (lb/yr)	Quarterly IPE (lb/qtr)
NOx	5,742	5,742	0
SOx	168	168	0
PM10	5,309	5,309	0
CO	26,350	26,350	0
VOC	1,502	1,502	0

Appendix V
Title V Permit to Operate N-1919-1-7

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1919-1-7

EXPIRATION DATE: 10/31/2017

EQUIPMENT DESCRIPTION:

LINE #3 (TORTILLA CHIP) CONSISTING OF TWO PERMIT EXEMPT PRE-COOKERS (STEAM-HEATED), TWO 1.9 MMBTU/HR OVENS (DIRECT-FIRED), ONE COOKER (STEAM-HEATED), ONE MECHANICAL SEASONER, AND A HEAT & CONTROL AMBIENT AIR COOLER SERVED BY A HIGH VELOCITY AIR FILTER.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The ovens shall be fired primarily on natural gas fuel. LPG fuel shall only be used during periods of natural curtailment, and the use of LPG shall not exceed 384 hours in a calendar year. [District Rule 2201 and 4801] Federally Enforceable Through Title V Permit
3. The combustion equipment shall be equipped with a mass or volumetric fuel flow meter capable of measuring the natural gas and LPG fuel usages. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from natural gas combustion in each oven shall not exceed any of the following emission limits: 0.1 lb-NOx/MMBtu, 0.0029 lb-SOx/MMBtu, 0.012 lb-PM10/MMBtu, 0.47 lb-CO/MMBtu, and 0.0053 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from LPG fuel combustion in each oven shall not exceed any of the following emission limits: 14 lb-NOx/1,000 gal, 0.45 lb-SOx/1,000 gal, 0.40 lb-PM10/1,000 gal, 42.535 lb-CO/1,000 gal, and 0.47 lb-VOC/1,000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions from the fryer shall not exceed 7.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC emissions from the fryer shall not exceed 3.3 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the ambient air cooler shall not exceed 5.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. The high velocity air filter system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
11. The high velocity air filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Records of high velocity air filter system maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] 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. The permittee shall maintain records sufficient to demonstrate compliance with each daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
14. The permittee shall surrender 351 metric tons of CO2 equivalent greenhouse gas (GHG) credits each year from a District-approved source, at least 60 days prior to the anniversary date of first operation (3/26/12), until the permittee supplies permanent GHG reductions, or complies with District established Best Performance Standard (BPS). All credits surrendered shall be demonstrated by the submittal of documentation, on or before the deadlines discussed above, that proves the retirement of the credits. [California Environmental Quality Act]

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