

September 7, 2021

Mr. John Yanak
J R Simplot Company
PO Box 128
Helm, CA 93627

Re: Notice of Final Action - Title V Permit Renewal
Facility Number: C-705
Project Number: C-1191749

Dear Mr. Yanak:

The District has issued the Final Renewed Title V Permit for J R Simplot Company (see enclosure). The preliminary decision for this project was made on March 1, 2021. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be posted on the District's website (www.valleyair.org).

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,



Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Laura Yannayon, EPA (w/enclosure) via EPS

Samir Sheikh
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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Final Title V Permit Renewal Evaluation
J R Simplot Company
C-705**

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TITLE V PERMIT RENEWAL EVALUATION

Fertilizer Production Facility

Engineer: Manuel Salinas
Date: September 1, 2021

Facility Number: C-705
Facility Name: J R Simplot Company
Mailing Address: PO Box 128
Helm, CA 93627

Contact Name: Gilbert Rodriguez
Phone: (559) 392-6902

Responsible Official: John Yanak
Title: CA Manufacturing Manager

Project # : C-1191749
Deemed Complete: May 29, 2019

I. PROPOSAL

J R Simplot was issued a Title V permit on December 1, 2015. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

J R Simplot is located at 12688 S Colorado Ave, in Helm, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2201, New and Modified Stationary Source Review Rule (amended February 18, 2016 ⇒ amended August 15, 2019)
- District Rule 2520, Federally Mandated Operating Permits (amended December 18, 2008 ⇒ amended August 15, 2019)
- District Rule 4601, Architectural Coatings (amended December 17, 2009 ⇒ amended December 17, 2019)¹
- 40 CFR Part 68, Chemical Accident Prevention Provisions (Amended December 19, 2019)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended August 23, 2019)²

¹ District Rule 4601 was amended on April 16, 2020, however the amended rule is not SIP-Approved by EPA; therefore conditions 23-25 for permit unit C-705-0-4 are still valid.

- 40 CFR Part 82, Subpart F, Recycling and Emission Reduction (amended December 27, 2017)²

B. Rules Removed

There are no applicable rules that were removed since the last Title V renewal.

C. Rules Added

There are no applicable rules that were added since the last Title V renewal.

D. Rules Not Updated

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 17, 1992)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (amended December 17, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended August 18, 2011 ⇒ amended December 18, 2014)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2410, Prevention Of Significant Deterioration (adopted June 16, 2011 ⇒ effective November 26, 2012)

² These subparts were amended since last renewal TV permit was issued. However, the amendments to these subparts do not have any effect on existing permit requirements as addressed by conditions 27 and 28 of permit unit C-705-0-4 on the draft renewed permit.

- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4102, Nuisance (amended December 17, 1992)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter – Emission Rate (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2 (amended August 21, 2003)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3 (amended October 16, 2008)
- District Rule 4320, Advanced Emission Reduction Options For Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr (amended October 16, 2008)
- District Rule 4351, Boilers, Steam Generators, and Process Heaters – Phase 1 (amended August 21, 2003)
- District Rule 4701, Internal Combustion Engines – Phase 1 (amended August 21, 2003)
- District Rule 4702, Internal Combustion Engines (amended November 14, 2013)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 8011, General Requirements (Amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (Amended August 19, 2004)
- District Rule 8031, Bulk Materials (Amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (Amended August 19, 2004)
- District Rule 8051, Open Areas (Amended August 19, 2004)

- District Rule 8061, Paved and Unpaved Roads (Amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (Amended September 16, 2004)
- 17 CCR 93115, California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 7.5, Measure 93115 (adopted December 8, 2004)
- 40 CFR Part 60, Subpart G, Standards for Nitric Acid Plants (Amended August 14, 2012)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (Amended July 20, 2004)
- 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Amended March 3, 2010 ⇒ amended February 27, 2014)
- 40 CFR Part 64, Compliance Assurance Monitoring (Amended July 20, 2004)

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Added/Updated

None

B. Rules Not Updated

District Rule 4102, Nuisance (as amended December 17, 1992)

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit.

A. **District Rule 2201 - New and Modified Stationary Source Review Rule (NSR)**

District Rule 2201 has been amended since this facility's initial Title V permit was issued. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit.

B. **District Rule 2520 - Federally Mandated Operating Permits**

Changes to this Rule since issuance of the previous TV permit affect the method of public noticing projects and do not affect the TV permit; however, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

Greenhouse Gas Discussion

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40 CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

C. **40 CFR Part 64 - Compliance Assurance Monitoring (CAM)**

40 CFR Part 64 requires Compliance Assurance Monitoring for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (lb/year)
NO _x	20,000
SO _x	140,000
PM ₁₀	140,000
CO	200,000
VOC	20,000

a. C-705-1 (71.4 MMBtu/hr boiler with SCR and FGR)

- (1) This unit contains an emission limit for NO_x of 5 ppmvd @3% O₂ or 0.0062 lb/MMBtu (per Rules 2201, 4305, 4306, 4320, and 4351).
- (2) This unit is equipped with Selective Catalytic Reduction (SCR) and Flue Gas Recirculation (FGR) systems for NO_x control. FGR results in up to 60% control³. To calculate uncontrolled NO_x emissions without SCR, the previous NO_x limit of 30 ppmvd @3% O₂ or 0.036 lb/MMBtu will be used.
- (3) Uncontrolled NO_x emissions:

$$\text{Annual Uncontrolled PE} = [0.036 \text{ lb-NO}_x/\text{MMBtu} \times 9,000 \text{ MMBtu/year} \div (1 - 0.6)]$$

$$\text{Annual Uncontrolled PE} = 810 \text{ lb-NO}_x/\text{year}$$

As shown above, the uncontrolled PE for NO_x emissions is less than the major source threshold (20,000 lb/year). Therefore, this unit is not subject to the requirements of 40 CFR 64 for NO_x.

Similarly CAM is not required for other pollutants as there are emissions limits on the current permit but there are no add-on controls for those pollutants (SCR system is not equipped with oxidation catalyst, so it is controlling only NO_x emissions and not affecting other pollutants).

b. C-705-2, '-10, and '-14 (Emergency IC engines)

These units do not contain add on control devices for any pollutant; therefore, are not subject to CAM.

c. C-705-3 (Nitric Acid Plant – NO₂ to N₂ combustor)

- (1) This unit contains an emission limit for NO₂ of 180 ppm (per District Rules 1080 and 2201; 40 CFR 60.72 (a) and 60.73)

³ Per http://205.153.241.230/P2_Opportunity_Handbook/12_7.html

(2) This unit is equipped with a NO₂ to N₂ butane fired combustor for NO_x emissions control, which is an add-on control for NO_x emissions.

(3) Uncontrolled emissions:

Simplot stated under District project C-1123368 that the maximum air flow rate for the nitric acid plant stack is 26,000 dscfm. Converting the 180 ppm NO_x emission limit to a lb/ton-HNO₃ value is as follows:

$$180 \text{ scf-NO}_x/10^6 \text{ scf exhaust} \times \text{lb-mol}/379.5 \text{ scf-NO}_x \times 46 \text{ lb-NO}_x/\text{lb-mol} \\ \times 26,000 \text{ scf-exhaust}/\text{min} \times 1440 \text{ min}/\text{day} = 816.9 \text{ lb-NO}_x/\text{day}$$

Thus

$$\text{PE} = 816.9 \text{ lb-NO}_x/\text{day}$$

NO₂ to N₂ combustor's control efficiency = 95% (project C-1123368)

$$\text{Annual Uncontrolled PE} = [816.9 \text{ lb-NO}_x/\text{day} \times 365 \text{ days}/\text{year} \div (1 - 0.95)] \\ = 5,963,370 \text{ lb-NO}_x/\text{year}$$

As shown above, the uncontrolled PE for NO_x emissions is greater than the major source threshold (20,000 lb/year). Therefore, this unit could be subject to CAM. However, 40 CFR §64.3(d) states that if a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS) is required pursuant to other authority under the Act or state or local law, the owner or operator shall use such system to satisfy the requirements of this part. Since the unit is equipped with CEMS for NO_x emissions as required by conditions 2, 9 and 12 of current PTO '3-15, CAM is satisfied.

In addition, the permit unit has emissions limits for particulate matter and sulfur emissions, but there are no add-on controls for these pollutants. Therefore, CAM is not required for these pollutants.

d. C-705-4 - Calcium Ammonium Nitrate (CAN-17) Plant

- (1) This unit contains the following emission limits: 0.004 lb-PM₁₀/ton, 0.0005 lb-NH₃/ton, 0.0039 lb-nitric acid/ton (per Rule 2201)
- (2) This unit is equipped by 2 scrubbers for PM₁₀, NH₃, and nitric acid control.

(3) Uncontrolled emissions:

PM10

Where:

PE = 2.0 lb-PM10/day (project C-980712)

Scrubber PM10 control = 95% (project C-950651)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [2.0 \text{ lb-PM10/day} \times 365 \text{ days/yr} \div (1-0.95)] \\ &= 14,600 \text{ lb-PM10/year}\end{aligned}$$

NH3

Where:

PE = 0.2 lb-NH3/day (project C-980712)

Scrubber NH3 control = 95% (project C-950651)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [0.2 \text{ lb-NH3/day} \times 365 \text{ days/yr} \div (1-0.95)] \\ &= 1,460 \text{ lb-NH3/year}\end{aligned}$$

Nitric Acid

Where:

PE = 2.0 lb-nitric acid/day (project C-980712)

Scrubber nitric acid control = 95% (Conservative Estimate)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [2.0 \text{ lb-nitric acid/day} \times 365 \text{ days/yr} \div (1-0.95)] \\ &= 14,600 \text{ lb-nitric acid/year}\end{aligned}$$

As shown above, the uncontrolled PE for PM10, NH3, and nitric acid emissions is less than the major source threshold for PM10 (140,000 lb/year). The major source threshold has been used for NH3 and nitric acid as the nature of those emissions are closest to PM10 compared to other pollutants with major source thresholds (SOx, CO, VOC, and NOx). Therefore, this unit is not subject to CAM.

e. C-705-5 (Liquid Ammonium Phosphate Unit)

(1) This unit contains an emission limit of 0.001 lb-PM₁₀/ton (per Rule 2201)

(2) This unit is equipped with a scrubber for PM₁₀ control.

(3) Uncontrolled emissions:

Where:

PE = 120 lb-PM₁₀/yr (project C-1081235)

Scrubber control = 95% (project C-950651)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [120 \text{ lb-PM}_{10}/\text{yr} \div (1-0.95)] \\ &= 2,400 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

As shown above, the uncontrolled PE for PM₁₀ emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to CAM.

f. C-705-6 (Ammonium Nitrate Plant)

(1) This unit contains an emission limit of 0.1 grains/dscf (per Rule 4201)

(2) This unit is equipped with a scrubber for PM₁₀ control.

(3) Uncontrolled emissions:

Where:

Controlled PE = 4,125 lb-PM₁₀/yr (project C-1081235)
Scrubber control = 95% (project C-950651)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [4,125 \text{ lb-PM}_{10}/\text{yr} \div (1-0.95)] \\ &= 82,500 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

As shown above, the uncontrolled PE for PM₁₀ emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to CAM.

g. C-705-11, '-12, and '-13 (Fertilizer Unloading)

These units do not contain add on control devices for any pollutant; therefore, are not subject to CAM.

h. C-705-15 (Limestone Receiving, Storing and Handling)

(1) This unit contains an emission limit for PM₁₀ of 0.01 gr/scf (per Rule 2201)

(2) This unit is equipped with a baghouse for PM₁₀ control.

(3) Uncontrolled emissions:

Where:

PE = 1,206 lb-PM₁₀/year (project C-1071722)
Baghouse control = 99% (District Practice)

$$\begin{aligned}\text{Annual Uncontrolled PE} &= [1,206 \text{ lb-PM}_{10}/\text{year} \div (1 - 0.99)] \\ &= 120,600 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

As shown above, the uncontrolled PE for PM₁₀ emissions is less than the major source threshold (140,000 lb/year). Therefore, this unit is not subject to CAM.

D. 40 CFR Part 68 – Chemical Accident Prevention Provisions

The requirements of 40 CFR Part 68 are applicable to facilities, which may store regulated substances above a threshold limit, as specified in the regulation.

40 CFR 68, Subpart A – General

Section 68.1 sets forth the list of regulated substances and thresholds, the petition process for adding or deleting substances to the list of regulated substances, the requirements for owners or operators of stationary sources concerning the prevention of accidental releases, and the State accidental release prevention programs approved under Section 112(r).

Pursuant to Section 68.10, except as provided in paragraphs (b) through (f) of the section, an owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under Section 68.115, shall comply with the requirements of this part no later than the latest of the following dates:

- (1) June 21, 1999;
- (2) Three years after the date on which a regulated substance is first listed under Section 68.130;
- (3) The date on which a regulated substance is first present above a threshold quantity in a process; or
- (4) For any revisions to this part, the effective date of the final rule that revises this part.

(b) By March 14, 2018, the owner or operator of a stationary source shall comply with the emergency response coordination activities in Section 68.93, as applicable.

(c) Within three years of when the owner or operator determines that the stationary source is subject to the emergency response program requirements of Section 68.95, pursuant to Section 68.90(a), the owner or operator must develop and implement an emergency response program in accordance with Section 68.95.

(d) By December 19, 2023, the owner or operator shall have developed plans for conducting emergency response exercises in accordance with provisions of Section 68.96, as applicable.

(e) The owner or operator of a stationary source shall comply with the public meeting requirement in Section 68.210(b) within 90 days of any RMP reportable accident at the stationary source with known offsite impacts specified in Section 68.42(a), that occurs after March 15, 2021.

(f) After December 19, 2024, for any risk management plan initially submitted as required by Sections 68.150(b)(2) or (3) or submitted as an update required by Section 68.190, the owner or operator shall comply with the following risk management plan provisions of subpart G of this part:

- (1) Reporting a public meeting after an RMP reportable accident under Section 68.160(b)(21) as promulgated on December 19, 2019;
- (2) Reporting emergency response program information under Section 68.180(a)(1) as promulgated on December 19, 2019;
- (3) Reporting emergency response program information under Section 68.180(a)(2) and (3) as promulgated on January 13, 2017, as applicable; and,
- (4) Reporting emergency response program and exercises information under Section 68.180(b) as promulgated on January 13, 2017, as applicable. The owner or operator shall submit dates of the most recent notification, field and tabletop exercises in the risk management plan, for exercises completed as required under §68.96 at the time the risk management plan is either submitted under §68.150(b)(2) or (3), or is updated under §68.190.

(g) *Program 1 eligibility requirements.* A covered process is eligible for Program 1 requirements as provided in Section 68.12(b) if it meets all of the following requirements:

- (1) For the five years prior to the submission of an RMP, the process has not had an accidental release of a regulated substance where exposure to the substance, its reaction products, overpressure generated by an explosion involving the substance, or radiant heat generated by a fire involving the substance led to any of the following offsite:
 - (i) Death;
 - (ii) Injury; or
 - (iii) Response or restoration activities for an exposure of an environmental receptor;
- (2) The distance to a toxic or flammable endpoint for a worst-case release assessment conducted under subpart B and Section 68.25 is less than the distance to any public receptor, as defined in Section 68.3; and

(3) Emergency response procedures have been coordinated between the stationary source and local emergency planning and response organizations.

(h) Program 2 eligibility requirements. A covered process is subject to Program 2 requirements if it does not meet the eligibility requirements of either paragraph (g) or paragraph (i) of this section.

(i) Program 3 eligibility requirements. A covered process is subject to Program 3 if the process does not meet the requirements of paragraph (g) of this section, and if either of the following conditions is met:

(1) The process is in NAICS code 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532; or

(2) The process is subject to the OSHA process safety management standard, 29 CFR 1910.119.

(j) If at any time a covered process no longer meets the eligibility criteria of its Program level, the owner or operator shall comply with the requirements of the new Program level that applies to the process and update the RMP as provided in Section 68.190.

40 CFR 68, Subpart B – Hazard Assessment

Pursuant to Section 68.20, the owner or operator of a stationary source subject to this part shall prepare a worst-case release scenario analysis as provided in Section 68.25 of this part and complete the five-year accident history as provided in Section 68.42.

40 CFR 68, Subpart C - Program 2 Prevention Program

40 CFR 68, Subpart C - Program 2 Prevention Program (Sections 68.48 through 60.60) specify the requirements for facilities subject to the Program 2 Prevention Program.

40 CFR 68, Subpart D - Program 3 Prevention Program

40 CFR 68, Subpart D - Program 3 Prevention Program (Sections 68.65 through 60.87) specify the requirements for facilities subject to the Program 3 Prevention Program.

40 CFR 68, Subpart E - Emergency Response

Pursuant to Section 68.90(a) - Responding Stationary Source, except as provided in paragraph (b) of this section, the owner or operator of a stationary source with Program 2 and Program 3 processes shall comply with the requirements of Sections 68.93, 68.95, and 68.96.

Pursuant to Section 68.90(b) - Non-responding stationary source, the owner or operator of a stationary source whose employees will not respond to accidental releases of regulated substances need not comply with Section 68.95 of this part provided that:

- (1) For stationary sources with any regulated toxic substance held in a process above the threshold quantity, the stationary source is included in the community emergency response plan developed under 42 U.S.C. 11003;
- (2) For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the owner or operator has coordinated response actions with the local fire department;
- (3) Appropriate mechanisms are in place to notify emergency responders when there is a need for a response;
- (4) The owner or operator performs the annual emergency response coordination activities required under Section 68.93; and
- (5) The owner or operator performs the annual notification exercises required under Section 68.96(a).

Pursuant to Section 68.93 - Emergency Response Coordination Activities, the owner or operator of a stationary source shall coordinate response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance.

Pursuant to Section 68.95 - Emergency Response Program, the owner or operator shall develop and implement an emergency response program for the purpose of protecting public health and the environment.

40 CFR 68, Subpart F - Regulated Substances for Accidental Release Prevention

This subpart designates substances to be listed under section 112(r)(3), (4), and (5) of the Clean Air Act, as amended, identifies their threshold quantities, and establishes the requirements for petitioning to add or delete substances from the list.

Section 68.130 – List of Substances lists regulated toxic and flammable substances under section 112(r) of the Clean Air Act in Tables 1, 2, 3, and 4. Threshold quantities for listed toxic and flammable substances are specified in the tables.

JR Simplot at times stores Ammonium Anhydrous greater than a minimum threshold, a regulated toxic substance listed in Table 1 of 40 CFR 68.130 and is therefore subject to these requirements.

40 CFR 68, Subpart G - Risk Management Plan

Section 68.150 – Submission requires the following:

(a) The owner or operator shall submit a single RMP that includes the information required by Sections 68.155 through 68.185 for all covered processes. The RMP shall be submitted in the method and format to the central point specified by EPA as of the date of submission.

(b) The owner or operator shall submit the first RMP no later than the latest of the following dates:

(1) June 21, 1999;

(2) Three years after the date on which a regulated substance is first listed under Section 68.130; or

(3) The date on which a regulated substance is first present above a threshold quantity in a process.

(c) The owner or operator of any stationary source for which an RMP was submitted before June 21, 2004, shall revise the RMP to include the information required by Section 68.160(b)(6) and (14) by June 21, 2004 in the manner specified by EPA prior to that date. Any such submission shall also include the information required by Section 68.160(b)(20) (indicating that the submission is a correction to include the information required by Sections 68.160(b)(6) and (14) or an update under Section 68.190).

(d) RMPs submitted under this section shall be updated and corrected in accordance with Sections 68.190 and 68.195.

(e) Notwithstanding the provisions of Sections 68.155 to 68.190, the RMP shall exclude classified information. Subject to appropriate procedures to protect such information from public disclosure, classified data or information excluded from the RMP may be made available in a classified annex to the RMP for review by Federal and state representatives who have received the appropriate security clearances.

(f) Procedures for asserting that information submitted in the RMP is entitled to protection as confidential business information are set forth in Sections 68.151 and 68.152.

Section 68.165 – Offsite Consequence Analysis requires (a) The owner or operator shall submit in the RMP information:

- (1) One worst-case release scenario for each Program 1 process; and
- (2) For Program 2 and 3 processes, one worst-case release scenario to represent all regulated toxic substances held above the threshold quantity and one worst-case release scenario to represent all regulated flammable substances held above the threshold quantity. If additional worst-case scenarios for toxics or flammables are required by §68.25(a)(2)(iii), the owner or operator shall submit the same information on the additional scenario(s). The owner or operator of Program 2 and 3 processes shall also submit information on one alternative release scenario for each regulated toxic substance held above the threshold quantity and one alternative release scenario to represent all regulated flammable substances held above the threshold quantity.

Section 68.168 - Five-year accident history requires the owner or operator shall submit in the RMP the information provided in Section 68.42(b) on each accident covered by Section 68.42(a).

Sections 68.170 - Prevention program/Program 2 and 68.175 - Prevention program/Program 3 specify the requirements for Program 2 and 3 Prevention Programs.

Section 68.190 - Updates requires The owner or operator shall review and update the RMP as specified in paragraph (b) of the section and submit it in the method and format to the central point specified by EPA as of the date of submission.

Section 68.195 - Required corrections requires the owner or operator of a stationary source for which a RMP was submitted shall correct the RMP as follows:

- (a) New accident history information—For any accidental release meeting the five-year accident history reporting criteria of Section 68.42 and occurring after April 9, 2004, the owner or operator shall submit the data required under Sections 68.168, 68.170(j), and 68.175(l) with respect to that accident within six months of the release or by the time the RMP is updated under Section 68.190, whichever is earlier.

(b) Emergency contact information—Beginning June 21, 2004, within one month of any change in the emergency contact information required under Section 68.160(b)(6), the owner or operator shall submit a correction of that information.

40 CFR 68, Subpart H – Other Requirements

Pursuant to Section 68.200 – Recordkeeping, the owner or operator shall maintain records supporting the implementation of this part at the stationary source for five years, unless otherwise provided in subpart D of this part.

Section 68.210 – Availability of information to the public, requires the following:

(a) *RMP availability.* The RMP required under subpart G of this part shall be available to the public under 42 U.S.C. 7414(c) and 40 CFR part 1400.

(b) *Public meetings.* The owner or operator of a stationary source shall hold a public meeting to provide information required under Section 68.42(b), no later than 90 days after any RMP reportable accident at the stationary source with any known offsite impact specified in Section 68.42(a).

(c) *Classified and restricted information.* The disclosure of information classified or restricted by the Department of Defense or other Federal agencies or contractors of such agencies shall be controlled by applicable laws, regulations, or executive orders concerning the release of that classified or restricted information.

The requirements of Section 68.215 – Permit content and air permitting authority or designated agency requirements, apply to any stationary source subject to this part 68 and parts 70 or 71 of this chapter.

(a) The 40 CFR part 70 or part 71 permit for the stationary source shall contain:

- (1) A statement listing this part as an applicable requirement;
- (2) Conditions that require the source owner or operator to submit:
 - (i) A compliance schedule for meeting the requirements of this part by the dates provided in Sections 68.10(a) through (f) and 68.96(a) and (b)(2)(i), or;
 - (ii) As part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of this part, including the registration and submission of the RMP.

(b) The owner or operator shall submit any additional relevant information requested by the air permitting authority or designated agency.

(c) For 40 CFR part 70 or part 71 permits issued prior to the deadline for registering and submitting the RMP and which do not contain permit conditions described in paragraph (a) of this section, the owner or operator or air permitting authority shall initiate permit revision or reopening according to the procedures of 40 CFR 70.7 or 71.7 to incorporate the terms and conditions consistent with paragraph (a) of this section.

(d) The state may delegate the authority to implement and enforce the requirements of paragraph (e) of this section to a state or local agency or agencies other than the air permitting authority. An up-to-date copy of any delegation instrument shall be maintained by the air permitting authority. The state may enter a written agreement with the Administrator under which EPA will implement and enforce the requirements of paragraph (e) of this section.

(e) The air permitting authority or the agency designated by delegation or agreement under paragraph (d) of this section shall, at a minimum:

- (1) Verify that the source owner or operator has registered and submitted an RMP or a revised plan when required by this part;
- (2) Verify that the source owner or operator has submitted a source certification or in its absence has submitted a compliance schedule consistent with paragraph (a)(2) of this section;
- (3) For some or all of the sources subject to this section, use one or more mechanisms such as, but not limited to, a completeness check, source audits, record reviews, or facility inspections to ensure that permitted sources are in compliance with the requirements of this part; and
- (4) Initiate enforcement action based on paragraphs (e)(1) and (e)(2) of this section as appropriate.

Pursuant to Section 68.220 – Audits, in addition to inspections for the purpose of regulatory development and enforcement of the Act, the implementing agency shall periodically audit RMPs submitted under subpart G of this part to review the adequacy of such RMPs and require revisions of RMPs when necessary to ensure compliance with subpart G of this part.

C-705-0-4: Facility-Wide Requirements

- Condition 42 of the requirements of the proposed facility-wide permit assures compliance.

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant does not propose to use any model general permit templates.

B. Requirements not Addressed by Model General Permit Templates

The applicant has not requested any permit shields other than as discussed above.

C. Obsolete Permit Shields From Existing Permit Requirements

There are no obsolete permit shields from the existing permit requirements.

X. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

XI. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Summary List of Facility Permits
- D. Facility Comments and District Responses

ATTACHMENT A

Draft Renewed Title V Operating Permit



Permit to Operate

FACILITY: C-705

EXPIRATION DATE: 11/30/2025

LEGAL OWNER OR OPERATOR: J R SIMPLOT COMPANY
MAILING ADDRESS: PO BOX 128
HELM, CA 93627

FACILITY LOCATION: 12688 S COLORADO AVE
HELM, CA 93627

FACILITY DESCRIPTION: FERTILIZER PRODUCTION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Samir Sheikh
Executive Director / APCO

Brian Clements
Director of Permit Services

San Joaquin Valley

Air Pollution Control District

FACILITY: C-705-0-4

EXPIRATION DATE: 11/30/2025

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: J R SIMPLOT COMPANY

Location: 12688 S COLORADO AVE, HELM, CA 93627

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10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. This facility is subject to 40 CFR Part 68. The facility shall submit a risk management plan (RMP) and all other required documentation to the appropriate agencies by the dates specified in 40 CFR 68. The facility shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR Part 70 [40 CFR 68] Federally Enforceable Through Title V Permit
43. On October 6, 2000 , the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] 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: C-705-1-11

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

71.4 MMBTU/HR UNION IRON WORKS MODEL SPG-50-FS NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM AND FLUE GAS RECIRCULATION (FGR) SYSTEM

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. This unit shall be fired exclusively on PUC quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
3. NOx emissions shall not exceed 5 ppmv @ 3% O2. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
4. CO emissions shall not exceed 200 ppmv @ 3% O2. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
5. Ammonia emissions shall not exceed 10 ppmv @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions shall not exceed any of the following limits: 0.0076 lb-PM10/MMBtu, 0.0006 lb-SOx/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201; 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
7. The maximum heat input to the unit shall not exceed 9 billion Btu per calendar year. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
8. Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
11. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. [District Rule 4301] Federally Enforceable Through Title V Permit
12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. To demonstrate compliance with this requirement, the unit shall be fired on PUC-quality natural gas or on natural gas with sulfur content not exceeding 4.2% by weight. [District Rule 4801 and County Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
13. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [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.

14. When determining sulfur emissions by fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails, weekly testing shall resume. [District Rule 2520] Federally Enforceable Through Title V Permit
15. 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
16. If the unit is fired on PUC-regulated natural gas, then the operator shall maintain copies of fuel invoices and supplier certification of fuel sulfur content. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Source testing to measure NO_x, CO, and NH₃ emissions from this unit while fired on natural gas 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 2201, 4305, 4306, 4320 and 4351] 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. 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
20. The source test plan shall identify which basis (ppmvd or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
21. 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 4320. [District Rules 4305, 4306, 4320 and 4351] 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, 4306, 4320 and 4351]
23. 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 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
26. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rule 1081] 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.

27. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH₃ monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
28. If 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 certified source test within 60 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
29. 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
30. Ammonia emission 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
31. The permittee shall monitor, at least on a monthly basis, the operational characteristics recommended by the unit manufacturer, e.g. the amount of water use, the amount of unit blow down, the exhaust stack temperature, or other characteristics recommended by the unit manufacturer. 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 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
32. 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
33. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(g)(2)] Federally Enforceable Through Title V Permit
34. 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 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(i)] Federally Enforceable Through Title V Permit
35. This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080 and Public Resources Code 21000-21177: California Environmental Quality Act]

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: C-705-2-4

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

469 BHP (INTERMITTENT) CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801; and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
8. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
9. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
10. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ]
11. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ]
12. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ]
14. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ]
15. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ]
16. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ]
17. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
18. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
19. 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 Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] 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: C-705-3-21

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH₃ TO NO CONVERTER, ONE WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO₃ ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO₂ TO N₂ BUTANE/NATURAL GAS-FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER

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. Permittee shall comply with all applicable source sampling requirements of District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
3. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x analyzer during District inspections. [District Rule 1081] Federally Enforceable Through Title V Permit
4. NO_x emissions (expressed as NO₂), excluding startup, shutdown and malfunction, shall not exceed 2.98 lbs/ton of 100% HNO₃ on a three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
5. Total NO_x emissions from this permit unit shall not exceed 834.4 lbs/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. NO_x emissions (expressed as NO₂) shall not exceed 0.78 lbs/ton of 100% HNO₃ on a 12 month rolling average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2 and compliance testing conducted at least once every twelve months thereafter utilizing USEPA Method 7 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit
7. Nitric acid production shall not exceed 280 tons-100% HNO₃/day, calculated on a 12 month rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Daily emission rates from the nitric acid plant including the butane/natural gas-fired combustor (non-selective catalytic reduction system) and the natural gas-fired catalyst preheater shall not exceed any of the following limits: 0.006 lb-SO_x/ ton-100% HNO₃, 0.13 lb-PM₁₀/ ton-100% HNO₃, 52.7 lb-CO/ ton-100% HNO₃, or 3.19 lb-VOC/ ton-100% HNO₃. Compliance shall be demonstrated with the firing of approved fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] 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. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
12. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO₃ produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
13. Compliance demonstration (source testing) shall be witnessed or authorized by the District and the samples shall be collected by a California Air Resources Board certified testing laboratory. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days of source testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The owner or operator shall certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x concentrations. The CEMS shall be capable of monitoring emissions during startups and shutdowns, as well as during normal operating conditions. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit
15. The continuous NO_x monitor shall meet the applicable performance specification requirements in 40 CFR Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
16. When the plant is in operation, the monitoring system shall perform a daily calibration drift test in accordance with 40 CFR 60.13d. [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
17. When the plant is operating, the CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.13(e)(2) and District Rule 1080] Federally Enforceable Through Title V Permit
18. The NO_x CEMS shall meet the requirements in 40 CFR Part 60, Appendix B Performance Specification 2. [District Rule 1080] Federally Enforceable Through Title V Permit
19. The owner/operator shall perform a relative accuracy test as specified by 40 CFR Part 60, Appendix B, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
20. The facility shall maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
21. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
22. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. this summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit
23. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO_x emissions, nature and the cause of excess (if known), corrective actions taken and preventative measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period and used to determine compliance with an emissions standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080] 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.

24. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit
25. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. Such a notice is not required for any maintenance or QA/QC activity on the system if the operator expects the down time to be less than four hours, but the operator must still report these periods in their quarterly report. [District Rule 1080] Federally Enforceable Through Title V Permit
26. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
27. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements. [40 CFR 60.7(b) and District Rules 1070 and 1080] Federally Enforceable Through Title V Permit
28. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b) shall be conducted [District Rule 2520] Federally Enforceable Through Title V Permit
29. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records to demonstrate compliance with the total daily NO_x emission limit and the 12 month rolling average NO_x emission rate. [District Rule 1070] Federally Enforceable Through Title V Permit
31. Records of the visible emissions inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] 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: C-705-4-11

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

PERMIT UNIT REQUIREMENTS

1. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fan air pressure shall be maintained at a minimum of 10 inches of water column to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b), shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
10. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520] 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: C-705-5-10

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.

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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Primary scrubber sprays shall have a minimum water flow rate of 5 gallon per minute and a minimum recirculation flow rate of 200 gallon per minute during unit operation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Secondary scrubber sprays shall have a minimum product flow rate of 50 gallon per minute during unit operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Cooling tower water circulation rate shall not exceed 5,000 gallon per minute [District Rule 2201] Federally Enforceable Through Title V Permit
7. Production rate shall be limited to 600 tons per day or 120,000 tons per year of liquid fertilizer solution. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from the liquid ammonium phosphate fertilizer operation shall not exceed 0.001 lb-PM10 per ton of liquid fertilizer solution produced. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Daily records of liquid fertilizer solution produced shall be maintained in order to verify compliance with the production rate limit. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
11. Weekly records of the flow rates of scrubber liquids shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b) shall be conducted. [District Rule 2520] 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: C-705-6-4

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER

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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Daily records of liquid fertilizer solution production and hours of operation shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
5. Weekly records of the scrubber pump head pressure shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber pump head pressure is adequately maintained. [District Rule 2520] 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: C-705-11-6

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER RAILCAR AND TRUCK RECEIVING, UNLOADING, AND STORAGE OPERATION CONSISTING OF A DRAG FLIGHT CONVEYOR, BUCKET ELEVATOR, CONVEYOR BELT, CONVEYOR BELT BRUSH, SHUTTLE CONVEYOR BELT, AND SHUTTLE MOVER, AND TRUCK LOADOUT FROM STORAGE OPERATION CONSISTING OF A DRAG CONVEYOR, BUCKET ELEVATOR, AND TELESCOPING CHUTE, AND RAILCAR TO TRUCK TRANSFER OPERATION CONSISTING OF A SCREW CONVEYOR, INCLINE SCREW CONVEYOR, AND TELESCOPING CHUTE

PERMIT UNIT REQUIREMENTS

1. Except for drop points, all railcar and truck unloading into storage building transfer operation conveyor belts, bucket elevator and shuttle mover shall be enclosed. [District Rule 2201] Federally Enforceable Through Title V Permit
2. PM10 emissions from the railcar and truck unloading into storage building transfer operation shall not exceed 0.0084 pounds per ton of dry fertilizer handled. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The maximum throughput for the dry fertilizer handled in the railcar and truck unloading into storage building transfer operation shall not exceed 1,200 tons/day or 42,000 tons in any twelve month period. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from railcar and truck unloading into storage building transfer operation shall not exceed 30.3 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. For a given material process rate (P), particulate matter emissions shall not exceed the hourly rate (E) 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 $E = 17.31 \times P^{0.16}$, P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
6. A daily record of monoammonium and ammonium phosphate throughput shall be maintained, kept, and made available to the District upon request. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
7. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
8. Records of inspection shall be maintained, kept, and made available to the District upon request. The records shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520] 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: C-705-12-6

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

AMMONIUM SULFATE AND UREA DRY FERTILIZER UNLOADING, STORAGE, AND LOADING OPERATIONS: PRIMARY UNLOADING OPERATION CONSISTING OF A TRUCK RECEIVING PIT, DRAG FLIGHT CONVEYOR, BUCKET ELEVATOR, AND SHUTTLE CONVEYOR; BACKUP UNLOADING OPERATION CONSISTING OF SEVEN BLOW PIPES; AND LOADOUT OPERATION CONSISTS OF HOPPER, CONDITIONER, BUCKET ELEVATOR, CONVEYORS, AND TELESCOPING TRUCK FILL CHUTE

PERMIT UNIT REQUIREMENTS

1. PM10 emissions from this operation shall not exceed 0.0084 pounds per ton of dry fertilizer handled. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The maximum throughput for the dry fertilizer handled at this operation shall not exceed 350 tons in any one day and 50,000 tons in any twelve month period. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include 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
5. Permittee shall maintain daily and annual records of the dry fertilizer handled at this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All records shall be maintained and retained on-site for a period of at least 5 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.

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-705-13-4

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput of urea shall be recorded, maintained, and made available to the District upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include 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

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: C-705-14-6

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

1,200 BHP (INTERMITTENT) DETROIT DIESEL MODEL R163-7K35 (16 V-2000) TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801; and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed any of the following limits: 6.86 g-NOx/bhp-hr, 8.50 g-CO/bhp-hr, or 0.97 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. Emissions from this IC engine shall not exceed 1.49 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] 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. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
13. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
14. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
19. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
21. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] 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 Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] 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: C-705-15-3

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOT MODEL 60BV36 BIN VENT FILTER AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

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. PM10 emissions from the bin vent filter serving the truck unloading operation shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from the baghouse serving the railcar pneumatic conveyance system shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The maximum throughput for the railcar unloading shed shall not exceed either of the following limits: 432 tons of material per day or 0.0035 lb PM10/ton of material. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from the railcar unloading shed shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from the exhaust of the bin vent filter serving the truck unloading operation and the baghouse serving the railcar conveyance operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
8. The bin vent filter and the baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The bin vent filter and the baghouse shall operate at all times with a minimum differential pressure of 0.2 inches water column and a maximum differential pressure of 5 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Differential operating pressure shall be monitored and recorded on each day that the bin vent filter and baghouse operate. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The bin vent filter and baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] 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. The bin vent filter and baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Replacement bags numbering at least 10% of the total number of bags in each bin vent filter and baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Material removed from each bin vent filter and baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of all maintenance of the baghouses, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] 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: C-705-17-1

EXPIRATION DATE: 11/30/2025

EQUIPMENT DESCRIPTION:

175 BHP JOHN DEERE MODEL 6068HFC28 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING A FIREWATER PUMP

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. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115 and 40 CFR Subpart IIII] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
4. Emissions from this IC engine shall not exceed any of the following limits: 2.83 g-NOx/bhp-hr, 0.90 g-CO/bhp-hr, or 0.07 g-VOC/bhp-hr as determined by the test method in 40 CFR Part 89, Section E. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed 0.09 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
6. This engine shall be operated and maintained according to the manufacturer's instructions or in a manner consistent with good air pollution control practice for minimizing emissions. If operating and/or maintaining in a manner different from the manufacturer's instructions, a maintenance plan and records of conducted maintenance must be kept and an initial performance test must be conducted to demonstrate compliance with the applicable emissions standards within 1 year from the date first operated and/or maintained in a manner different from the manufacturer's instructions. [40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
8. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII] 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.

Facility Name: J R SIMPLOT COMPANY

Location: 12688 S COLORADO AVE, HELM, CA 93627

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9. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. 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 Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley

Air Pollution Control District

FACILITY: C-705-0-3

EXPIRATION DATE: 11/30/2019

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: J R SIMPLOT COMPANY

Location: 12688 S COLORADO AVE, HELM, CA 93627

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10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. This facility is subject to 40 CFR part 68. The facility shall submit a risk management plan (RMP) by June 21, 1999, or other dates specified in 40 CFR 68.10. The facility shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit
43. On October 6, 2000 , the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] 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: C-705-1-10

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

71.4 MMBTU/HR UNION IRON WORKS MODEL SPG-50-FS NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM AND FLUE GAS RECIRCULATION (FGR) SYSTEM

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. This unit shall be fired exclusively on PUC quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
3. NOx emissions shall not exceed 5 ppmv @ 3% O2. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
4. CO emissions shall not exceed 200 ppmv @ 3% O2. [District Rules 2201, 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
5. Ammonia emissions shall not exceed 10 ppmv @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions shall not exceed any of the following limits: 0.0076 lb-PM10/MMBtu, 0.0006 lb-SOx/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201; 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
7. The maximum heat input to the unit shall not exceed 9 billion Btu per calendar year. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
8. Owner/operator shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit, or shall install a master meter which measures fuel to all units in a group of similar units. [District Rule 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
11. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. [District Rule 4301] Federally Enforceable Through Title V Permit
12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. To demonstrate compliance with this requirement, the unit shall be fired on PUC-quality natural gas or on natural gas with sulfur content not exceeding 4.2% by weight. [District Rule 4801 and County Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
13. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [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.

14. When determining sulfur emissions by fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails, weekly testing shall resume. [District Rule 2520] Federally Enforceable Through Title V Permit
15. 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
16. If the unit is fired on PUC-regulated natural gas, then the operator shall maintain copies of fuel invoices and supplier certification of fuel sulfur content. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Source testing to measure NO_x, CO, and NH₃ emissions from this unit while fired on natural gas 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 2201, 4305, 4306, 4320 and 4351] 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. 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
20. The source test plan shall identify which basis (ppmvd or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
21. 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 4320. [District Rules 4305, 4306, 4320 and 4351] 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, 4306, 4320 and 4351]
23. 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, 4320 and 4351]
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]
25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4320 and 4351]
26. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081]
27. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH₃ monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. 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 4305, 4306, 4320 and 4351] 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.

28. If 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 certified source test within 60 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
29. 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
30. Ammonia emission 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
31. The permittee shall monitor, at least on a monthly basis, the operational characteristics recommended by the unit manufacturer, e.g. the amount of water use, the amount of unit blow down, the exhaust stack temperature, or other characteristics recommended by the unit manufacturer. 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 day of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
32. 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 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
33. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(g)(2)] Federally Enforceable Through Title V Permit
34. 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 4305, 4306, 4320 and 4351 and 40 CFR Part 60.48c(i)] Federally Enforceable Through Title V Permit
35. This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080 and Public Resources Code 21000-21177: California Environmental Quality Act]

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: C-705-2-3

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

469 BHP (INTERMITTENT) CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801; and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
8. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
9. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
10. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ]
11. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ]
12. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ]
14. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ]
15. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ]
16. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ]
17. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
18. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
19. 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 Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] 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: C-705-3-19

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH₃ TO NO CONVERTER, ONE WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO₃ ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO₂ TO N₂ BUTANE/NATURAL GAS-FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER

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. Permittee shall comply with all applicable source sampling requirements of District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
3. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x analyzer during District inspections. [District Rule 1081] Federally Enforceable Through Title V Permit
4. NO_x emissions (expressed as NO₂), excluding startup, shutdown and malfunction, shall not exceed 2.98 lbs/ton of 100% HNO₃ on a three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
5. Total NO_x emissions from this permit unit shall not exceed 834.4 lbs/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. NO_x emissions (expressed as NO₂) shall not exceed 0.78 lbs/ton of 100% HNO₃ on a 12 month rolling average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2 and compliance testing conducted within 60 days of implementation of this Authority to Construct and at least once every twelve months thereafter utilizing USEPA Method 7. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit
7. Nitric acid production shall not exceed 280 tons-100% HNO₃/day, calculated on a 12 month rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Daily emission rates from the nitric acid plant including the butane/natural gas-fired combustor (non-selective catalytic reduction system) and the natural gas-fired catalyst preheater shall not exceed any of the following limits: 0.006 lb-SO_x/ ton-100% HNO₃, 0.13 lb-PM₁₀/ ton-100% HNO₃, 52.7 lb-CO/ ton-100% HNO₃, or 3.19 lb-VOC/ ton-100% HNO₃. Compliance shall be demonstrated with the firing of approved fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] 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. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
12. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO₃ produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
13. Compliance demonstration (source testing) shall be witnessed or authorized by the District and the samples shall be collected by a California Air Resources Board certified testing laboratory. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days of source testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The owner or operator shall certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x concentrations. The CEMS shall be capable of monitoring emissions during startups and shutdowns, as well as during normal operating conditions. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit
15. The continuous NO_x monitor shall meet the applicable performance specification requirements in 40 CFR Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
16. When the plant is in operation, the monitoring system shall perform a daily calibration drift test in accordance with 40 CFR 60.13d. [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
17. When the plant is operating, the CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.13(e)(2) and District Rule 1080] Federally Enforceable Through Title V Permit
18. The NO_x CEMS shall meet the requirements in 40 CFR Part 60, Appendix B Performance Specification 2. [District Rule 1080] Federally Enforceable Through Title V Permit
19. The owner/operator shall perform a relative accuracy test as specified by 40 CFR Part 60, Appendix B, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
20. The facility shall maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
21. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
22. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. this summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit
23. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO_x emissions, nature and the cause of excess (if known), corrective actions taken and preventative measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period and used to determine compliance with an emissions standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080] 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.

24. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit
25. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. Such a notice is not required for any maintenance or QA/QC activity on the system if the operator expects the down time to be less than four hours, but the operator must still report these periods in their quarterly report. [District Rule 1080] Federally Enforceable Through Title V Permit
26. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
27. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements. [40 CFR 60.7(b) and District Rules 1070 and 1080] Federally Enforceable Through Title V Permit
28. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
29. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records to demonstrate compliance with the total daily NOx emission limit and the 12 month rolling average NOx emission rate. [District Rule 1070] Federally Enforceable Through Title V Permit
31. Records of the visible emissions inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] 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: C-705-4-10

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

PERMIT UNIT REQUIREMENTS

1. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fan air pressure shall be maintained at a minimum of 10 inches of water column to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
10. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520] 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: C-705-5-9

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.

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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Primary scrubber sprays shall have a minimum water flow rate of 5 gallon per minute and a minimum recirculation flow rate of 200 gallon per minute during unit operation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Secondary scrubber sprays shall have a minimum product flow rate of 50 gallon per minute during unit operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Cooling tower water circulation rate shall not exceed 5,000 gallon per minute [District Rule 2201] Federally Enforceable Through Title V Permit
7. Production rate shall be limited to 600 tons per day or 120,000 tons per year of liquid fertilizer solution. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from the liquid ammonium phosphate fertilizer operation shall not exceed 0.001 lb-PM10 per ton of liquid fertilizer solution produced. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Daily records of liquid fertilizer solution produced shall be maintained in order to verify compliance with the production rate limit. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
11. Weekly records of the flow rates of scrubber liquids shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] 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: C-705-6-3

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER

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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Daily records of liquid fertilizer solution production and hours of operation shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
5. Weekly records of the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520] 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: C-705-11-5

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS

PERMIT UNIT REQUIREMENTS

1. Equipment for railcar and truck unloading into storage building consists of drag flight conveyor, bucket elevator, conveyor belt, conveyor belt brush, shuttle conveyor belt, and shuttle mover. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Equipment for truck loading from storage consists of a drag conveyor, bucket elevator, and telescoping chute. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Equipment for railcar to truck transfer consists of a screw conveyor, incline screw conveyor, and telescoping chute. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Except for drop points, all railcar and truck unloading into storage building transfer operation conveyor belts, bucket elevator and shuttle mover shall be enclosed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. PM10 emissions from the railcar and truck unloading into storage building transfer operation shall not exceed 0.0084 pounds per ton of dry fertilizer handled. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The maximum throughput for the dry fertilizer handled in the railcar and truck unloading into storage building transfer operation shall not exceed 1,200 tons/day or 42,000 tons in any twelve month period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from railcar and truck unloading into storage building transfer operation shall not exceed 30.3 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For a given material process rate (P), particulate matter emissions shall not exceed the hourly rate (E) 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 $E = 17.31 \times P^{0.16}$, P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. A daily record of monoammonium and ammonium phosphate throughput shall be maintained, kept, and made available to the District upon request. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
10. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
11. Records of inspection shall be maintained, kept, and made available to the District upon request. The records shall at least include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520] 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: C-705-12-5

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

AMMONIUM SULFATE AND UREA DRY FERTILIZER UNLOADING, STORAGE, AND LOADING OPERATIONS: PRIMARY UNLOADING OPERATION CONSISTING OF A TRUCK RECEIVING PIT, DRAG FLIGHT CONVEYOR, BUCKET ELEVATOR, AND SHUTTLE CONVEYOR; BACKUP UNLOADING OPERATION CONSISTING OF SEVEN BLOW PIPES; AND LOADOUT OPERATION CONSISTS OF HOPPER, CONDITIONER, BUCKET ELEVATOR, CONVEYORS, AND TELESCOPING TRUCK FILL CHUTE

PERMIT UNIT REQUIREMENTS

1. PM10 emissions from this operation shall not exceed 0.0084 pounds per ton of dry fertilizer handled. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The maximum throughput for the dry fertilizer handled at this operation shall not exceed 350 tons in any one day and 50,000 tons in any twelve month period. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include 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
5. Permittee shall maintain daily and annual records of the dry fertilizer handled at this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All records shall be maintained and retained on-site for a period of at least 5 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.

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

PERMIT UNIT: C-705-13-3

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
2. A daily throughput of urea shall be recorded, maintained, and made available to the District upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
3. Enclosures shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
4. Records of inspection shall be maintained, kept, and made available to the District upon request. the record shall at least include 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

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: C-705-14-5

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

1,200 BHP (INTERMITTENT) DETROIT DIESEL MODEL R163-7K35 (16 V-2000) TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801; and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed any of the following limits: 6.86 g-NOx/bhp-hr, 8.50 g-CO/bhp-hr, or 0.97 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. Emissions from this IC engine shall not exceed 1.49 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] 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. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
13. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
14. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
19. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
21. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] 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 Rule 4702; 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] 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: C-705-15-2

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOT MODEL 60BV36 BIN VENT FILTER AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

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. PM10 emissions from the bin vent filter serving the truck unloading operation shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from the baghouse serving the railcar pneumatic conveyance system shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The maximum throughput for the railcar unloading shed shall not exceed either of the following limits: 432 tons of material per day or 0.0035 lb PM10/ton of material. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions from the railcar unloading shed shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from the exhaust of the bin vent filter serving the truck unloading operation and the baghouse serving the railcar conveyance operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
8. The bin vent filter and the baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in easily accessible locations. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The bin vent filter and the baghouse shall operate at all times with a minimum differential pressure of 0.2 inches water column and a maximum differential pressure of 5 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Differential operating pressure shall be monitored and recorded on each day that the bin vent filter and baghouse operate. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The bin vent filter and baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] 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. The bin vent filter and baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Replacement bags numbering at least 10% of the total number of bags in each bin vent filter and baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Material removed from each bin vent filter and baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of all maintenance of the baghouses, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] 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: C-705-17-0

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

175 BHP JOHN DEERE MODEL 6068HFC28 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING A FIREWATER PUMP

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. 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
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115 and 40 CFR Subpart IIII] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 2.83 g-NO_x/bhp-hr, 0.90 g-CO/bhp-hr, or 0.07 g-VOC/bhp-hr as determined by the test method in 40 CFR Part 89, Section E. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed 0.09 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
8. This engine shall be operated and maintained according to the manufacturer's instructions or in a manner consistent with good air pollution control practice for minimizing emissions. If operating and/or maintaining in a manner different from the manufacturer's instructions, a maintenance plan and records of conducted maintenance must be kept and an initial performance test must be conducted to demonstrate compliance with the applicable emissions standards within 1 year from the date first operated and/or maintained in a manner different from the manufacturer's instructions. [40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
10. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII] 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. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. 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 Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Detailed Summary List of Facility Permits

Detailed Facility Report
For Facility=705 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

J R SIMPLOT COMPANY 12688 S COLORADO AVE HELM, CA 93627	FAC # STATUS: TELEPHONE:	C 705 A 5598665681	TYPE: TOXIC ID:	TitleV 40139	EXPIRE ON: AREA: INSP. DATE:	11/30/2019 8 / 314 07/21
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-705-1-10	71.4 MMBTU/HR U.I.W. BOILER	3020-02 H	1	1,238.00	1,238.00	A	71.4 MMBTU/HR UNION IRON WORKS MODEL SPG-50-FS NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM AND FLUE GAS RECIRCULATION (FGR) SYSTEM
C-705-2-3	469.0 HP I.C. ENGINE	3020-10 D	1	577.00	577.00	A	469 BHP (INTERMITTENT) CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR
C-705-3-23	6.87 MMBTU/HR NITRIC ACID PLNT	3020-02 G	1	980.00	980.00	A	NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH3 TO NO CONVERTER, ONE WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE/NATURAL GAS-FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER
C-705-4-10	1230.0 HP #3 PHOS ACID PLANT	3020-01 G	1	980.00	980.00	A	CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS
C-705-5-9	167.5 hp	3020-01 D	1	379.00	379.00	A	LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.
C-705-6-3	190.0 HP AMMO-NITRATE PLANT	3020-01 D	1	379.00	379.00	A	190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER
C-705-11-5	121.0 HP UNLOADING OPERATION	3020-01 D	1	379.00	379.00	A	MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS
C-705-12-5	122.5 HP UNLOADING OPERATION	3020-01 D	1	379.00	379.00	A	AMMONIUM SULFATE AND UREA DRY FERTILIZER UNLOADING, STORAGE, AND LOADING OPERATIONS: PRIMARY UNLOADING OPERATION CONSISTING OF A TRUCK RECEIVING PIT, DRAG FLIGHT CONVEYOR, BUCKET ELEVATOR, AND SHUTTLE CONVEYOR; BACKUP UNLOADING OPERATION CONSISTING OF SEVEN BLOW PIPES; AND LOADOUT OPERATION CONSISTS OF HOPPER, CONDITIONER, BUCKET ELEVATOR, CONVEYORS, AND TELESCOPING TRUCK FILL CHUTE
C-705-13-3	72.5 HP UNLOADING SHED	3020-01 C	1	239.00	239.00	A	72.5 HP UREA UNLOADING SHED INCLUDING RECEIVING HOPPER, ENCLOSED SCREW CONVEYOR, ENCLOSED BUCKET ELEVATOR, AIR SPARGED DAY TANK, AND ASSOCIATED PUMPS AND BLOWER
C-705-14-5	1200 hp Detroit Diesel engine	3020-10 F	1	900.00	900.00	A	1,200 BHP (INTERMITTENT) DETROIT DIESEL MODEL R163-7K35 (16 V-2000) TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

Detailed Facility Report
For Facility=705 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-705-15-2	125 HP	3020-01 D	1	379.00	379.00	A	LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOT MODEL 60BV36 BIN VENT FILTER AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE
C-705-17-0	175 bhp IC engine	3020-10 B	1	143.00	143.00	A	175 BHP JOHN DEERE MODEL 6068HFC28 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIREWATER PUMP

Number of Facilities Reported: 1

ATTACHMENT D

Facility Comments and District Responses

Permit Unit C-705-0-4: Facility-Wide Requirements

1. Facility Comment: Condition 42 – 40 CFR Part 68 Requirements

Simplot requests the air district largely retain the language in the existing permit condition 42 for C-705-0. Simplot provides the following changes to account for the revisions in Part 68, included the revision to the RMP submittal date(s) identified in Part 68.

Existing Permit N-767-0-4: Condition 42. “This facility is subjected to 40 CFR part 68. The facility shall submit a risk management plan (RMP) to the appropriate agencies by ~~June 21, 1999, or other~~ the dates as specified in 40 CFR 68.40. The facility shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR part 70 [40 CFR Part 68] Federally Enforceable Through Title V Permit”

District Response:

The District discussed the requested change with EPA in similar TV renewal project N-1191693 at facility N-767. Based on the recommendation of EPA in project N-1191693, Condition 42 of Permit Unit C-705-0-4 has been updated to the following:

42. This facility is subject to 40 CFR Part 68. The facility shall submit a risk management plan (RMP) and all other required documentation to the appropriate agencies by the dates specified in 40 CFR 68. The facility shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR Part 70. [40 CFR Part 68] Federally Enforceable Through Title V Permit

Permit Unit C-705-1-11: 71.4 MMBTU/HR UNION IRON WORKS MODEL SPG-50-FS NATURAL GAS FIRED BOILER WITH LOW-NOX BURNER AND SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM AND FLUE GAS RECIRCULATION (FGR) SYSTEM

1. Facility Comment: Conditions 23 – 26 – Allow Alternative Method approved by EPA and APCO

Conditions 23, 24, 25, and 26: Simplot requests inclusion of “or an alternative method approved by EPA and the APCO.

District Response:

Conditions 23 through 26, of Permit Unit C-705-1-11 have been updated as follows to allow use of an alternative method approved by EPA and the APCO as allowed by 40 CFR 60.8(b):

23. 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 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
25. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rules 4305, 4306, 4320 and 4351] Federally Enforceable Through Title V Permit
26. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b). [District Rule 1081] Federally Enforceable Through Title V Permit

Permit Unit C-705-2-4: 469 BHP (INTERMITTENT) CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

1. **Facility Comment:** Conditions 12 and 15 – 40 CFR 63 Subpart ZZZZ

Condition 12: Simplot requests removal this permit condition from the permit and for it to be incorporated into Condition 15, please see TV renewal application.

Condition 15: Simplot requests an update to this condition (as shown below) in the TV renewal application.

The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first, unless the permittee chooses to utilize an oil analysis program. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. ~~The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first.~~ The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning

District Response:

The District has determined flexibility is already listed in the two general conditions and no benefit would be gained in making a combined condition. No change was made.

Permit Unit C-705-3-21: NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH3 TO NO CONVERTER, ONE WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE/NATURAL GAS-FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER

1. **Facility Comment:** Conditions 6 and 28 – Correct condition and Allow Alternative Method approved by EPA and APCO

Condition 6: Simplot understands the phrase “within 60 days of implementation of this Authority to Construct” was included in error and it will be removed.

Condition 6: Simplot requests the compliance testing requirement be included as a separate condition with inclusion of “or an alternative method approved by EPA and the APCO”

Condition 28: Simplot requests inclusion of “or an alternative method approved by EPA and the APCO”

District Response:

The District has removed the language in condition 6 that was inadvertently included. In addition, conditions 6 and 28 of Permit Unit C-705-3-21 have been updated as follows to allow use of an alternative method approved by EPA and the APCO as allowed by 40 CFR 60.8(b):

6. NO_x emissions (expressed as NO₂) shall not exceed 0.78 lbs/ton of 100% HNO₃ on a 12 month rolling average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2 and compliance testing conducted at least once every twelve months thereafter utilizing USEPA Method 7 or an alternative method approved

by EPA and the APCO as per 40 CFR 60.8(b). [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit

28. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b) shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit

Permit Unit C-705-4-11: CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

1. **Facility Comment:** Condition 9 - Allow Alternative Method approved by EPA and APCO

Condition 9: Simplot requests inclusion of “or an alternative method approved by EPA and the APCO”

District Response:

Condition 9, of Permit Unit C-705-4-11 have been updated as follows to allow use of an alternative method approved by EPA and the APCO as allowed by 40 CFR 60.8(b):

9. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b), shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit

Permit Unit C-705-5-10: LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS

1. **Facility Comment:** Condition 12 - Allow Alternative Method approved by EPA and APCO

Condition 12: Simplot requests inclusion of “or an alternative method approved by EPA and the APCO”

District Response:

Condition 12, of Permit Unit C-705-5-10 has been updated as follows to allow use of an alternative method approved by EPA and the APCO as allowed by 40 CFR 60.8(b):

12. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 or an alternative method approved by EPA and the APCO as per 40 CFR 60.8(b) shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit

Permit Unit C-705-6-4: 190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER

2. Facility Comment: Condition 5 – Revise Descriptive Language

Condition 5: Simplot requests including the term “scrubber pump head pressure” in lieu of “the flow rate of scrubber liquid” as shown below:

Weekly records of the scrubber pump head pressure ~~flow rate of scrubber liquid~~ shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber pump head pressure liquid is adequately maintained.

District Response:

The District has determined the initial condition was added to indicate the unit was operating correctly and has made the administrative change for clarity. The condition has been changed to the following.

5. Weekly records of the scrubber pump head pressure shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber pump head pressure is adequately maintained. [District Rule 2520] Federally Enforceable Through Title V Permit

Permit Unit C-705-11-6: MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER STORAGE AND UNLOADING OPERATION WITH ENCLOSED CONVEYORS AND ELEVATORS

1. **Facility Comment:** Conditions 1-3 – Added to Equipment Description

Simplot requests Conditions 1, 2, and 3 be transferred to the equipment description.

District Response:

The District has made the administrative change as requested. The equipment description has been changed to the following.

MONOAMMONIUM PHOSPHATE AND AMMONIUM PHOSPHATE DRY FERTILIZER RAILCAR AND TRUCK RECEIVING, UNLOADING, AND STORAGE OPERATION CONSISTING OF A DRAG FLIGHT CONVEYOR, BUCKET ELEVATOR, CONVEYOR BELT, CONVEYOR BELT BRUSH, SHUTTLE CONVEYOR BELT, AND SHUTTLE MOVER, AND TRUCK LOADOUT FROM STORAGE OPERATION CONSISTING OF A DRAG CONVEYOR, BUCKET ELEVATOR, AND TELESCOPING CHUTE, AND RAILCAR TO TRUCK TRANSFER OPERATION CONSISTING OF A SCREW CONVEYOR, INCLINE SCREW CONVEYOR, AND TELESCOPING CHUTE

Permit Unit C-705-14-6: 1,200 BHP (INTERMITTENT) DETROIT DIESEL MODEL R163-7K35 (16 V-2000) TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

1. **Facility Comment:** Conditions 15 and 18 – 40 CFR 63 Subpart ZZZZ

Condition 15: Simplot requests this condition be removed and incorporated into Condition 18.

Condition 18: Simplot requests an update to this condition, as shown below.

The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first, unless the permittee chooses to utilize an oil analysis program. The permittee has the option of utilizing an oil analysis program in order to extend the oil changing requirement of every 500 hours of operation or every 12 months, whichever comes first. ~~The oil analysis must be performed every 500 hours of operation or every 12 months, whichever comes first.~~ The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemnina

District Response:

The District has determined flexibility is already listed in the two general conditions and no benefit would be gained in making a combined condition. No change was made.