



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 17 2014

Mr. Kendrick Mueller
ConAgra Foods
544 S Yosemite Ave
Oakdale, CA 95361

**Re: Final - Authority to Construct / COC (Significant Mod)
District Facility # N-1976
Project # N-1132542**

Dear Mr. Mueller:

The Air Pollution Control Officer has issued an Authority to Construct (ATC N-1976-27-0) with a Certificate of Conformity to ConAgra Foods at 544 S. Yosemite Avenue, Oakdale, California. The project is to install a new 176.5 MMBtu/natural gas fired boiler which will be served by a selective catalytic reduction system.

Enclosed are the Authority to Construct and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permit was published on January 29, 2014. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on January 27, 2014. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95358-8718
Tel: (209) 557-8400 FAX: (209) 557-8475

Central Region (Main Office)
1980 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6081

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 861-392-5500 FAX: 861-392-5585

Mr. Kendrick Mueller
Page 2

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Warner', with a long horizontal flourish extending to the right.

David Warner
Director of Permit Services

Enclosures

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



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1976-27-0

ISSUANCE DATE: 03/05/2014

LEGAL OWNER OR OPERATOR: CONAGRA FOODS
MAILING ADDRESS: ATTN: REGIONAL ENVIRONMENTAL MANAGER
554 S YOSEMITE AVE
OAKOALE, CA 95361

LOCATION: 554 S YOSEMITE AVE
OAKOALE, CA 95361

EQUIPMENT DESCRIPTION:

176.5 MMBTU/HR CLEAVER BROOKS MODEL NB-500D-100 NATURAL GAS-FIRED WITH A CLEAVER BROOKS MODEL NATCOM LOW NOX BURNER AND A C&C PANASIA (OR EQUIVALENT MANUFACTURER) SELECTIVE CATALYTIC REDUCTION SYSTEM

CONDITIONS

1. The permittee shall cease the operation of boilers under permits N-1976-3 and N-1976-5 by December 31, 2013. [District Rule 2201] Federally Enforceable Through Title V Permit
2. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions from this unit shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. 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

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances, and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadreidin, Executive Director / APCD

DAVID WARNER, Director of Permit Services

N-1976-27-0 Mar 5 2014 7:52AM - KAHLOLI Joint Inspection NOT Required

7. The unit shall only be fired on PUC-quality natural gas with a sulfur content of no greater than 1.0 grains (gr) of sulfur per 100 standard cubic feet (scf) of natural gas. [District Rules 2201 and 4320, 40 CFR 60.42b(k)(1)(2)] Federally Enforceable Through Title V Permit
8. 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]
9. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit
10. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. Duration of each startup and each shutdown shall not exceed 2.0 hours. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
12. The total duration of startup and shutdown period shall not exceed 4.0 hours in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The total duration of startup and shutdown period shall not exceed 80 hours during any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. During startup and shutdown, NO_x emissions shall not exceed 80 ppmvd @ 3% O₂ or 0.097 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. During startup and shutdown, CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Except during startup and shutdown, NO_x emissions shall not exceed 5.0 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu, referenced as NO₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Except during startup and shutdown, CO emissions shall not exceed 50 ppmvd @ 3% O₂ or 0.037 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. PM₁₀ emissions shall not exceed 0.005 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. VOC emissions shall not exceed 0.004 lb/MMBtu, referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NH₃ emissions from the SCR system shall not exceed 10.0 ppmvd @ 3% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Source testing to measure startup and shutdown NO_x and CO emissions shall be conducted within 60 days of initial startup. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Source testing to measure steady state NO_x, CO, PM₁₀, VOC and NH₃ emissions shall be conducted within 60 days of initial startup. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. Source testing to measure NO_x, CO and NH₃ emissions during steady state operation shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 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 12 months. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

27. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
33. Source testing to measure PM₁₀ shall be conducted using either: EPA Method 201 or 201A, and 202; or CARB Method 5 in combination with 501. Should the applicant decide to use different methodology, the methodology must be approved by the District prior to its use. [District Rule 2201] Federally Enforceable Through Title V Permit
34. In lieu of performing a source test for PM₁₀, the results of the total particulate test may be used for compliance with the PM₁₀ emissions limit provided the results include both the filterable and condensable (back half) particulate, and that all particulate matter is assumed to be PM₁₀. Source testing to measure concentrations of total particulate emissions shall be conducted using EPA method 5. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Source testing to measure VOC emissions shall be conducted using EPA Method 18 or 25A. Should the applicant decide to use different methodology, the methodology must be approved by the District prior to its use. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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 gas detection tubes (Dräger brand or District approved equivalent). Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
39. If either the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a 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 performing the notification and testing required by this condition. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

40. All NO_x, CO, O₂ and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
41. Ammonia emissions readings shall be conducted at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
42. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
43. The permittee shall maintain record of the following items: (1) date; (2) duration of each startup (hours); (3) duration of each shutdown (hours); (4) total start-up and shutdown durations per day (hour/day); (5) total start-up and shutdown durations per month (hours/month); (6) total startup and shutdown duration in a 12 consecutive month period. [District Rule 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
44. The owner or operator shall either obtain fuel receipts (such as a valid purchase contract, tariff sheet, or transportation contract) from the fuel supplier that certify that the gaseous fuel meets definition of natural gas (as defined in 40 CFR 60.41b) and the applicable sulfur limit (i.e., 1.0 gr-S/100 scf), or demonstrate that the combusted gas is provided from a PUC or FERC regulated source, or monitor the sulfur content within 60 days of initial startup and weekly thereafter. If the sulfur content is less than or equal to 1.0 gr/100 dscf for eight consecutive weeks, then the monitoring frequency shall be every six months. If the result of any six month monitoring demonstrates that the fuel does not meet the fuel sulfur content limit, weekly monitoring shall resume until compliance is demonstrated for eight consecutive weeks. [District Rule 4320, 40 CFR 60.45b(j), 60.49b(r)(2)] Federally Enforceable Through Title V Permit
45. For 40 CFR Part 60 Subpart Db purposes, NO_x emissions shall not exceed 0.1 lb/MMBtu for low heat release units (70,000 Btu/hr-ft³ of furnace volume or less) and 0.2 lb/MMBtu for high heat release units (greater than 70,000 Btu/hr-ft³ of furnace volume) on a 30-day rolling average basis. NO_x standard shall apply at all times including periods of startup, shutdown, or malfunction. The permittee shall maintain record of the furnace volume, which is defined as the volume bounded by the front furnace wall where the burner is located, the furnace side waterfall, and extending to the level just below or in front of the first row of convection pass tubes [40 CFR 60.44b(a), 60.44b(h), 60.44b(i)] Federally Enforceable Through Title V Permit
46. For the initial compliance test under 40 CFR Part 60 Subpart Db, NO_x emissions shall be monitored for 30 successive steam generating unit operating days and the 30-day average emission rate shall be used to determine compliance with the NO_x emission standard under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft³ of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft³ of furnace volume)). The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period. [40 CFR 60.46b(e)(1)] Federally Enforceable Through Title V Permit
47. Following the initial compliance test under 40 CFR Part 60 Subpart Db, the operator shall upon request determine compliance with the NO_x standard under 40 CFR 60.44 (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft³ of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft³ of furnace volume)) through the use of a 30-day performance test. During periods when performance tests are not requested, NO_x emissions data collected pursuant to §60.48b(g)(1) or §60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NO_x emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO_x emission data for the preceding 30 steam generating unit operating days. [40 CFR 60.46b(e)(4)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

48. The owner or operator shall monitor steam generating unit operating conditions and predict NOx emission rates as specified in a plan submitted pursuant to §60.49b(c) and approved by the District. [40 CFR 60.48b(g)(2)] Federally Enforceable Through Title V Permit
49. The owner or operator shall submit notification of the date of initial startup and the annual capacity factor at which the owner or operator anticipate to operate this unit. [40 CFR Part 60.49b(a)(3)] Federally Enforceable Through Title V Permit
50. The owner or operator shall submit the data from initial performance test to demonstrate compliance with 40 CFR Part 60 Subpart Db within 60 days after completing the initial test. [40 CFR 60.49b(b)] Federally Enforceable Through Title V Permit
51. The owner or operator shall develop and submit a plan, within 360 days of initial startup of the unit, to predict the hourly NOx emissions. The plan shall: (1) Identify the specific operating conditions to be monitored and the relationship between these operating conditions and NOx emission rates (i.e., ng/J or lbs/MMBtu heat input). Steam generating unit operating conditions include, but are not limited to, the degree of staged combustion (i.e., the ratio of primary air to secondary and/or tertiary air) and the level of excess air (i.e., flue gas O2 level); (2) Include the data and information that the owner or operator used to identify the relationship between NOx emission rates and these operating conditions; and (3) Identify how these operating conditions, including steam generating unit load, will be monitored under §60.48b(g) on an hourly basis by the owner or operator during the period of operation of the affected facility; the quality assurance procedures or practices that will be employed to ensure that the data generated by monitoring these operating conditions will be representative and accurate; and the type and format of the records of these operating conditions, including steam generating unit load, that will be maintained by the owner or operator under §60.49b(g). If the plan is approved, the owner or operator shall maintain records of predicted nitrogen oxide emission rates and the monitored operating conditions, including steam generating unit load, identified in the plan. [40 CFR Part 60.49b(c)] Federally Enforceable Through Title V Permit
52. The owner or operator shall maintain records of the amount of fuel combusted during each day in this unit. [40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit
53. The owner or operator shall maintain records of the annual capacity factor on a monthly basis. The annual capacity factor shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. [40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit
54. The owner or operator shall maintain records and submit a written report each calendar quarter to the District containing the following information for each steam generating unit operating day: (1) Calendar date; (2) The average hourly NOx and CO emission rates (expressed as NO2) (ppmvd @ 3% O2 and lb/MMBtu heat input) measured or predicted; (3) The 30-day average NOx emission rates (lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days; (4) Identification of the steam generating unit operating days when the calculated 30-day average NOx emission rates are in excess of the NOx emissions standards under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft³ of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft³ of furnace volume)), with the reasons for such excess emissions as well as a description of corrective actions taken; (5) Identification of the steam generating unit operating days when the average hourly NOx and CO emission rates are in excess of the NOx and CO limits (startup, shutdown and steady state) in this permit, with the reason for such excess emissions as well as a description of corrective actions taken; (6) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (7) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data; (8) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted; and (11) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080, 2201, 4305, 4306 and 4320, 40 CFR 60.49b(g), 40 CFR 60.49b(i), and 40 CFR 60.49b(w)] Federally Enforceable Through Title V Permit
55. The owner or operator shall maintain all records of required monitoring data and support information for a period of five years from the date of data entry and shall make such records available to the District upon request. [District Rules 1070, 2201, 4305, 4306, and 4320, and 40 CFR 60.49b(o)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

56. The owner or operator of an affected facility may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 40 CFR 60.49b(v)] Federally Enforceable Through Title V Permit