

November 30, 2022

Ms. Kristie Wdowiak
Frito-Lay, Inc.
600 Garner Rd
Modesto, CA 95357

**Re: Final – Authority to Construct / Certificate of Conformity (Minor Modification)
District Facility # N-1919
Project # N-1220099**

Dear Ms. Wdowiak:

The Air Pollution Control Officer has issued Authorities to Construct (N-1919-22-0 and N-23-0) with Certificates of Conformity to Frito-Lay, Inc. at 600 Garner Rd, in Modesto. The proposed project is to install onion fried snack manufacturing line and a corn meal silo. Enclosed are the Authorities to Construct and a copy of the notice of final action that has been posted on the District's website (www.valleyair.org).

Notice of the District's preliminary decision to issue the Authority to Construct permit was posted on October 13, 2022. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on October 13, 2022. No comments were received following the District's preliminary decision on this project.

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.

Prior to operating with the 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. Application forms have been enclosed for your use. These forms may also be found on the District's website at www.valleyair.org.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

Ms. Kristie Wdowiak
Page 2

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

Sincerely,



Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Gerardo Rios, EPA (w/enclosure) via EPS

Facility # N-1919
FRITO-LAY INC
600 GARNER RD
MODESTO, CA 95357-0514

AUTHORITY TO CONSTRUCT (ATC)

QUICK START GUIDE

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Modify Your Title V Permit.** Prior to operating the equipment authorized under this ATC, submit an application to modify your Title V permit. See application forms at <http://www.valleyair.org/permits/TVforms>.
3. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
4. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
5. **Notify District:** You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
6. **Source Test:** Schedule and perform any required source testing. See http://www.valleyair.org/busind/comply/source_testing.htm for source testing resources.
7. **Maintain Records:** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years. Sample record keeping forms can be found at http://www.valleyair.org/busind/comply/compliance_forms.htm.

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

For assistance, please contact District Compliance staff at any of the telephone numbers listed below.

Samir Sheikh

Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1919-22-0

ISSUANCE DATE: 11/30/2022

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

LOCATION: 600 GARNER RD
MODESTO, CA 95357-0514

EQUIPMENT DESCRIPTION:

ONION FRIED SNACK (OFS) MANUFACTURING LINE CONSIST OF THREE SHICK ESTEVE (OR EQUIVALENT MAKE AND MODEL) BAG DUMP STATIONS EACH VENTED TO ITS OWN SHICK ESTEVE IQC (OR EQUIVALENT MAKE AND MODEL) FILTER SYSTEM, THREE USE BINS EACH VENTED TO ITS OWN SHICK ESTEVE IQC (OR EQUIVALENT MAKE AND MODEL) FILTER SYSTEM, ONE HOPPER VENTED TO SHICK ESTEVE IQC (OR EQUIVALENT MAKE AND MODEL), ONE BLENDER VENTED TO A SHICK ESTEVE MQC (OR EQUIVALENT MAKE AND MODEL), TEN EXTRUDERS, A STEAM-OPERATED CLOSED-TOP VEGETABLE OIL FRYER VENTED THROUGH AN OIL MIST ELIMINATOR (OME), A HEAT & CONTROL (OR EQUIVALENT MAKE AND MODEL) AMBIENT AIR COOLER SERVED BY HIGH VELOCITY FILTRATION SYSTEM, AND A SEASONING SYSTEM CONSISTING OF A DUMP STATION AND TUMBLER VENTED TO A TRI-MER 10-H (OR EQUIVALENT MAKE AND MODEL) ORIFICE WATER SCRUBBER, AND A PERMIT-EXEMPT ELECTRIC OVEN FOR HEATING EXTRUDER DIES

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions from each operation under this permit shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services
N-1919-22-0 : Nov 30 2022 2:41PM -- KAHLOJ : Joint Inspection NOT Required

5. 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
6. Visible emissions from each dust collection system serving the bag dump stations, use bins, a hopper, a blender, and an ambient air cooler 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. The combined total PM10 emissions from material handling operations utilizing three bag dump stations, three use bins, a hopper, and a blender shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the vegetable oil fryer exhaust downstream of the oil mist eliminator system shall not exceed 0.6 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions from the vegetable oil fryer exhaust downstream of the oil mist eliminator system shall not exceed 11.0 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Oil mist eliminator system shall reduce at least 85% (by weight) of the uncontrolled VOC emissions and 95% (by weight) of the uncontrolled PM10 emissions from the vegetable oil fryer. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions from the ambient air cooler exhaust downstream of high velocity filtration system shall not exceed 7.7 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. High velocity filtration system shall reduce uncontrolled PM10 emissions by at least 70% (by weight) from the ambient air cooler. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM10 emissions from the seasoning system exhaust downstream of scrubber system shall not exceed 3.3 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Water scrubber shall reduce uncontrolled PM10 emissions by at least 95% (by weight) from the seasoning system. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The seasoning system scrubber water circulation rate (gallons per minute) range shall be established per manufacturer's recommendation at time of startup inspection. This information shall be administratively incorporated in the Permit to Operate. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The seasoning system scrubber water circulation rate (gallons per minute) shall be monitored and recorded each day the seasoning system operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to verify compliance with emission limits and control efficiency requirements of emission control devices for vegetable oil fryer, seasoner system, and ambient air cooler shall be conducted within 60 days of producing a sellable product. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
19. 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
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. The District Compliance Division may approve lesser time period for each test run upon evaluating technical justification for such request. [District Rule 2201] Federally Enforceable Through Title V Permit
21. 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 decided 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

CONDITIONS CONTINUE ON NEXT PAGE

22. 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
23. A presurvey must be done prior to source testing to determine VOC compound analytes present in the effluent stream from vegetable oil fryer. The presurvey shall be used to develop the appropriate sampling approach to ensure efficient collection of all VOCs present in the effluent and to develop a specific list of target compounds to be quantified during the subsequent total VOC source testing. VOC source testing shall be conducted using EPA Methods 18, 25, 25A. EPA Methods 25 or 25A can be used to determine the total VOCs only if the analyzer is calibrated with appropriate compound as determined during the presurvey, and the total carbon mass is scaled to the mole fraction of that appropriate compound, with the balance being scaled to the relative mole fraction of the other identified compounds. The Method 25 or 25A scaling factor shall be reported in the source test report and may be listed in the Permit to Operate for future testing (if any) required by the District. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201] Federally Enforceable Through Title V Permit
25. 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
26. The owner or operator shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Visible emissions from each dust collection system shall be inspected annually 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 2201] Federally Enforceable Through Title V Permit
28. Bags or filters associated with each dust collection system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Records of equipment & associated control device(s) maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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 Rule 1070] Federally Enforceable Through Title V Permit
31. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010] Federally Enforceable Through Title V Permit
33. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
34. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or increase in firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Prior to operating equipment under Authority to Construct permit N-1919-22-0, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 355 lb, 2nd quarter - 355 lb, 3rd quarter - 356 lb, and fourth quarter - 356 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. ERC Certificate Numbers S-3411-1 and/or S-3426-1 (or a certificate split from these certificates) shall be used to supply the required VOC offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct permits shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct permit. [District Rule 2201] Federally Enforceable Through Title V Permit
37. Prior to operating equipment under Authority to Construct permit N-1919-22-0, permittee shall surrender PM10 emission reduction credits for the following quantity of emissions: 1st quarter - 1,643 lb, 2nd quarter - 1,643 lb, 3rd quarter - 1,643 lb, and fourth quarter - 1,643 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
38. ERC Certificate Number S-5255-4 (or a certificate split from this certificate) shall be used to supply the required PM10 offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct permits shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct permit. [District Rule 2201] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1919-23-0

ISSUANCE DATE: 11/30/2022

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

LOCATION: 600 GARNER RD
MODESTO, CA 95357-0514

EQUIPMENT DESCRIPTION:
CORN MEAL SILO VENTED THROUGH A SCHICK ESTEVE IQC FILTER SYSTEM; SILO FILLED USING PNEUMATIC CORNMEAL UNLOADER FILTER/RECEIVER SYSTEM UNDER PERMIT N-1919-19-0

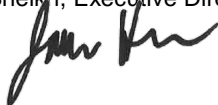
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions from silo filter system exhaust under this permit shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. 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
6. Visible emissions from the dust collection system serving the silo 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

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.

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

N-1919-23-0 : Nov 30 2022 2:41PM -- KAHLOJ : Joint Inspection NOT Required

7. PM10 emissions from the corn meal silo served by the dust collection system shall not exceed 0.00025 pounds per ton of material conveyed in the silo. [District Rule 2201] Federally Enforceable Through Title V Permit
8. No more than 162 tons of material shall be conveyed in the silo during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Visible emissions from the dust collection system shall be inspected annually 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 2201] Federally Enforceable Through Title V Permit
10. The owner or operator shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Bags or filters associated with each dust collection system shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records of equipment & associated control device(s) maintenance, inspections, and repair shall be maintained. The records shall include the identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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 Rule 1070] Federally Enforceable Through Title V Permit
14. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010] Federally Enforceable Through Title V Permit
16. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
17. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or increase in firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit