

February 26, 2026

Mr. Chris Ware
J R Simplot Company
PO Box 128
Helm, CA 93627

Re: Notice of Preliminary Decision – Title V Permit Renewal
Facility Number: C-705
Project Number: C-1252652

Dear Mr. Ware:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for J R Simplot Company at 12688 S Colorado Ave, Helm, California.

The notice of preliminary decision for this project has been posted on the District's website (<https://ww2.valleyair.org>). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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: EPA Region 9 Air Permitting Manager (w/enclosure) via EPS

Samir Sheikh
Executive Director/Air Pollution Control Officer

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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

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

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TITLE V PERMIT RENEWAL EVALUATION

Fertilizer Manufacturing Facility

Engineer: Mungi Hong
Date: February 26, 2026

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

Contact Name: Julia Gentry
Phone: (559) 829-8242

Responsible Official: Chris Ware
Title: (559) 866-5681

Project # : C-1252652
Deemed Complete: July 1, 2025

I. PROPOSAL

J R Simplot Company was issued its last renewed Title V permit on September 9, 2021. 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 previously renewed 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 Company 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.

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 August 15, 2019 – SIP version ⇒ amended April 20, 2023 – non-SIP version)
- District Rule 2520, Federally Mandated Operating Permits (amended June 20, 2024)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters - Phase 3 (amended October 16, 2008 – SIP version ⇒ amended December 17, 2020 – non-SIP version)
- District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters greater than 5.0 MMBTU/HR (amended October 16, 2008 – SIP version ⇒ amended December 17, 2020 – non-SIP version)
- District Rule 4601, Architectural Coatings (amended April 16, 2020)
- District Rule 4702, Internal Combustion Engines (amended November 14, 2013 – SIP version ⇒ amended August 19, 2021 – non-SIP version)
- District Rule 8051, Open Areas (amended September 21, 2023)
- 40 CFR Part 60, Subpart A, General Provisions (amended August 29, 2025)
- 40 CFR Part 60, Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (amended August 30, 2024)

- 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (amended February 27, 2014 ⇒ amended August 30, 2024)
- 40 CFR Part 64, Compliance Assurance Monitoring (amended October 22, 1997)
- 40 CFR Part 68, Chemical Accident Prevention Provisions (amended January 17, 2025)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended April 23, 2021)
- 40 CFR Part 82, Subpart F, Recycling and Emission Reduction (amended July 15, 2024)

B. Rules Removed

- Fresno County Rule 110, Equipment Breakdown (SIP approved 8/22/1977 ⇒ rescinded from the SIP March 28, 2024)
- Kern County Rule 111, Equipment Breakdown (SIP approved 10/24/1980 ⇒ rescinded from the SIP March 28, 2024)
- Kings County Rule 111, Equipment Breakdown (SIP approved, last amended 6/18/1982 ⇒ rescinded from the SIP March 28, 2024)
- Madera County Rule 113, Equipment Breakdown (SIP approved 11/18/1983 ⇒ rescinded from the SIP March 28, 2024)
- Merced County Rule 109, Equipment Breakdown (SIP approved 6/18/1982 ⇒ Not applicable to facilities outside of Merced County)
- San Joaquin County Rule 110, Equipment Breakdown (SIP approved 12/5/1984 ⇒ Not applicable to facilities outside of San Joaquin County)
- Stanislaus County Rule 110, Equipment Breakdown (SIP approved 6/1/1983 ⇒ rescinded from the SIP March 28, 2024)
- Tulare County Rule 111, Equipment Breakdown (SIP approved 8/22/1977 ⇒ rescinded from the SIP March 28, 2024)

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 16, 1993)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended December 18, 2014)
- District Rule 2031, Transfer of Permits (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 4101, Visible Emissions (amended February 17, 2005)
- 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 4351, Boilers, Steam Generators, and Process Heaters - Phase 1 (amended August 21, 2003)
- District Rule 8011, Fugitive Dust 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 8061, Paved and Unpaved Roads (amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Areas (amended September 16, 2004)
- 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (amended October 7, 2020)
- 40 CFR Part 60, Subpart G, Standards of Performance for Nitric Acid Plants (amended August 14, 2012)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (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

- District Rule 2040, Applications (amended December 17, 1992)

District Rule 2040 was adopted into the State Implementation Plan (SIP) September 21, 1999. However, effective on December 16, 2004, as a correction to California's SIP, EPA removed Rule 2040 as well as rules from over 30 California air districts that solely concerned administrative actions, local fees, enforcement authorities, variances, and hearing board procedures. However, the current facility-wide permit, condition #7, indicates Rule 2040 is federally enforceable. Therefore, the federal enforceability designation will be removed from condition #7 on the proposed facility-wide permit:

- 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~~

B. Rules Not Updated

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 4102, Nuisance (amended December 17, 1992)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- California Code of Regulation, Title 17, Chapter 1, Subchapter 7.5, Section 93115, Airborne Toxic Control Measure for Stationary Compression Ignition Engines (amended May 19, 2011)

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. Fresno County Rule 110, Kern County Rule 111, Kings County Rule 111, Madera County Rule 113, Merced County Rule 109, San Joaquin County Rule 110, Stanislaus County Rule 110, and Tulare County Rule 111 - Equipment Breakdown

On March 28, 2024, the EPA took final action to rescind Fresno County Rule 110, Stanislaus County Rule 110, Kern County Rule 111, Kings County Rule 111, Tulare County Rule 111, and Madera County Rule 113 from the State Implementation Plan (SIP). Moreover, the references to Merced County Rule 109 and San Joaquin County Rule 110 will be removed from the permit since the facility is not located within Merced County or San Joaquin County.

Therefore, conditions #1 and 2 on Permit to Operate (PTO) C-705-0-4 are no longer federally enforceable. Additionally, condition #39 on PTO C-705-0-4 has been modified to remove all references to county breakdown rules.

- 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]

B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's Title V permit was last issued. However, the requirements of this rule are only triggered when a source installs new equipment and/or undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit. Therefore, the updated requirements of this rule are not applicable at this time.

C. District Rule 2520 - Federally Mandated Operating Permits

District Rule 2520 has been amended since this facility's Title V permit was last renewed. The amendments to this rule were administrative and the amendments to this rule did not have any effect on current permit requirements and will therefore not be addressed further in this evaluation. 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.

D. District Rule 4306 - Boilers, Steam Generators, and Process Heaters - Phase 3

This rule limits NO_x and CO emissions from boilers, steam generators and process heaters rated greater than 5 MMBtu/hr. The boiler permitted as C-705-1 is subject to the requirements of this rule.

The October 16, 2008 version of District Rule 4306 was approved into the SIP on January 13, 2010. The rule was amended on December 17, 2020 and the California Air Resources Board (CARB) sent the amendments to EPA for inclusion in the SIP on March 12, 2021 but has yet been approved. The December 17, 2020 amendments to District Rule 4306 added definitions for digester gas, fire tube boiler, normal operation (as opposed to start-up and shutdown), replacement unit, school, and thermal fluid heater to improve clarity and/or address new categories for the more stringent Tier 2 NO_x emission limits of the amended rule; removed the definition of a load following unit and

the specific emission limits for load following units and required these units to comply with the same emission limits as other units of the same size; added additional categories; required lower Tier 2 NOx emission limits for various categories; and established dates for the submission of emission control plans and ATC applications and compliance with the lower Tier 2 NOx emission limits.

There were no notable changes to District Rule 4306 other than those discussed above. The requirement to comply with the lower Tier 2 NOx emission limits in the December 17, 2020 version of Rule 4306 makes it more stringent than the October 16, 2008 version of Rule 4306.

This facility has one boiler (permit unit C-705-1) that is subject to District Rule 4306. The only potential effect of the December 17, 2020 amendments to District Rule 4306 is to lower the required NOx emission limits or reduce the maximum annual fuel input allowed for the unit.

The Tier 1 and Tier 2 emission limits required for the boiler pursuant to District Rule 4306, Section 5.1 are shown below.

Section 5.1.1 states that except for units subject to Sections 5.2, on and after the Compliance Deadline specified in Section 7, units shall not be operated in a manner which exceeds the applicable NOx and carbon monoxide (CO) emissions limits specified in Table 1 (until December 30, 2023) and Table 2 (on and after December 31, 2023).

Table 1: Tier 1, NOx and CO Limits (until December 31, 2023)		
Category	Operated on Gaseous Fuel	
	NOx Limit	CO Limit
B. Units with a rated heat input greater than 20.0 MMBtu/hr, except for Categories C, D, E, F, G, H and I units	30 ppmv or 0.036 lb/MMBtu	400 ppmv

Table 2: Tier 2, NOx and CO Limits (on and after December 31, 2023)		
Category	Operated on Gaseous Fuel	
	NOx Limit	CO Limit
B.2. All other units with a total rated heat input >20.0 MMBtu/hr and ≤ 75 MMBtu/hr	7 ppmv or 0.0085 lb/MMBtu	400 ppmv

The boiler is rated at 71.4 MMBtu/hr and has a permit condition limiting NOx emissions to 5 ppmvd @ 3% O₂ during normal operation. Therefore, the boiler complies with the applicable Tier 1 and Tier 2 emission limits of District Rule 4306.

The below conditions ensure compliance with this rule.

Permit Unit	Condition #
C-705-1-12	3, 4, 6, 7, 8, 17, 20, 21, 22, 23, 24, 25, 27, 28, 29, 30, 31, 32, 33, and 34

E. District Rule 4320 - Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr

This rule limits NOx and CO emissions from boilers, steam generators and process heaters rated greater than 5 MMBtu/hr. The boiler permitted as C-705-1 is subject to the requirements of this rule.

The October 16, 2008 version of District Rule 4320 was approved into the SIP on March 25, 2011. The rule was amended on December 17, 2020 and CARB sent the amendments to EPA for inclusion in the SIP on March 12, 2021 but has yet been approved. The December 17, 2020 amendments to District Rule 4320 added definitions for digester gas, fire tube boiler, normal operation (as opposed to start-up and shutdown), replacement unit, school, and thermal fluid heater to improve clarity and/or address new categories for the more stringent Tier 2 NOx emission limits of the amended rule; added additional categories; required lower Tier 2 NOx emission limits for various categories; and established dates for the submission of emission control plans and ATC applications and compliance with the lower Tier 2 NOx emission limits.

There were no notable changes to District Rule 4320 other than those discussed above. The requirement to comply with the lower Tier 2 NOx emission limits if the operator is not paying annual emissions fees in the December 17, 2020 version of Rule 4320 makes it more stringent than the October 16, 2008 version of Rule 4320.

This facility has one boiler (permit unit C-705-1) that is subject to District Rule 4320. The only potential effect of the December 17, 2020 amendments to District Rule 4320 is to lower the required NOx emission limits, require payment of annual emissions fees, or reduce the maximum annual fuel input allowed for the unit.

Section 5.1 states that an operator of a unit(s) subject to this rule shall comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis:

- 5.1.1 Operate the unit to comply with the emission limits specified in Sections 5.2 and 5.4; or

- 5.1.2 Pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4; or
- 5.1.3 Comply with the applicable Low-use Unit requirements of Section 5.5.

Section 5.2 requires that units subject to this section shall not be operated in a manner which exceeds the applicable NOx emissions limit specified in Table 1 - Tier 1 NOx Emissions Limits (until December 31, 2023) and Table 2 - Tier 2 NOx Emissions Limits (on and after December 31, 2023). Section 5.2 also requires that units subject to this section shall not be operated in a manner to which exceeds a carbon monoxide (CO) emissions limit of 400 ppmv. All ppmv emission limits specified in Section 5.2 are referenced at dry stack gas conditions and 3.00 percent by volume stack gas oxygen (O₂). Emission concentrations shall be corrected to 3.00 percent oxygen in accordance with Section 8.1.

Table 1: Tier 1, NOx (until December 31, 2023)			
Category	NOx Limit	Authority to Construct	Compliance Deadline
B. Units with a total rated heat input > 20.0 MMBtu/hr, except for Categories C through G units	a) Standard Schedule 7 ppmv or 0.008 lb/MMBtu; or	July 1, 2009	July 1, 2010
	b) Enhanced Schedule 5 ppmv or 0.0062 lb/MMBtu	January 1, 2013	January 1, 2014

Table 2: Tier 2, NOx (on and after December 31, 2023)				
Category	NOx Limit	Emission Control Plan	Authority to Construct	Compliance Deadline
E. Units limited by a Permit to Operate to an annual heat input > 1.8 billion Btu/yr but ≤ 30 billion Btu/yr	9 ppmv or 0.011 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023

The boiler is rated at 71.4 MMBtu/hr and has a permit condition limiting NOx emissions to 5 ppmvd @ 3% O₂ during normal operation. Also, a maximum heat input to the boiler is limited to 9 billion Btu per calendar year (condition# 7 in the draft permit '-1-12). Therefore, the boiler complies with the applicable Tier 1 and Tier 2 emission limits of District Rule 4306.

The below conditions ensure compliance with this rule.

Permit Unit	Condition #
C-705-1-12	2, 3, 4, 6, 7, 8, 15, 17, 20, 21, 22, 23, 24, 25, 27, 28, 29, 30, 31, 32, 33, and 34

F. District Rule 4601 - Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. The VOC content limits for coatings and colorants are listed in Tables 1 and 2, respectively, of Section 5.0 of the amended rule. This rule also specifies architectural coatings storage, cleanup, and labeling requirements.

The rule was amended in April 16, 2020, and EPA approved the rule for inclusion in the SIP on December 14, 2022.

The following changes were included in the latest rule amendment that resulted in revising current permit requirements:

- Table of Standards 1 (through 12/31/2010) and Table of Standards 2 (after 1/1/2011) specifying the VOC content of different coatings and colorants have been replaced with Table 1 and Table 2 (effective after 1/1/2022) in Section 5.0.

To ensure compliance with Rule 4601 as amended 4/16/2020, conditions #23, 24, and 25 of the current facility-wide permit C-705-0-4 will be replaced with conditions 23, 24, and 25 on the draft facility-wide permit C-705-0-5.

- No person shall manufacture, blend, repackage, supply, market, sell, solicit or apply any architectural coating or colorant with a VOC content in excess of the applicable limits specified in Table 1 (Coatings) and Table 2 (Colorants) of District Rule 4601 (4/16/20), unless exempted under section 4.0 of District Rule 4601 (4/16/20). [District Rule 4601]
- All VOC-containing materials subject to Rule 4601 (4/16/20) shall be stored in closed containers when not in use. [District Rule 4601]
- The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (4/16/20). [District Rule 4601]

G. District Rule 4702 - Internal Combustion Engines

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), and sulfur oxides (SO_x) from internal combustion engines.

District Rule 4702 was amended on August 19, 2021. However, the amended rule is not SIP-approved by EPA. The previous version of this rule (amended November 14, 2013) is SIP-approved and was addressed by the District's previous permit renewal. The August 19, 2021 amendment to this rule

consisted of the lowering of the NOx and VOC emissions limits for some engine categories, clarifications to definitions, and updates to test methods. Additionally, the amendments established particulate matter emission control requirements for all engines that are operated in the Valley as well as SOx control requirements for agricultural engines. Based on these amendments to the SIP approved rule, the amended rule is as stringent as, if not more stringent than, the SIP approved version of the rule.

Three engines (permit units '-2, '-14, and '-17) at this facility are compression-ignited emergency engines, and are not affected by any of the amendments made during the 2021 rule amendment. Therefore, continued compliance is expected.

The below conditions ensure compliance with this rule.

Permit Unit	Condition #
C-705-2-5	1, 4, 6, 7, 8, 9, 17, 18, and 19
C-705-14-7	1, 5, 9, 10, 11, 12, 20, 21, and 22
C-705-17-2	2, 7, 8, 9, 10, and 11

H. District Rule 8051 - Open Areas

The purpose of this rule is to limit fugitive dust emissions from open areas. This rule currently applies to any open area having 0.5 acres or more within urban areas, or 3.0 acres or more within rural areas; and contains at least 1,000 square feet of disturbed surface area.

Section 5.0 requires that whenever an open area is disturbed or vehicles are used in an open area, the owner/operator shall implement one or a combination of control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit Visible Dust Emissions (VDE) to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

The following condition of the proposed requirements of the draft facility-wide permit ensures compliance with this rule.

Permit Unit	Condition #
C-705-0-5	32

I. 40 CFR Part 60, Subpart A - General Provisions

Except as provided in subparts B, Ba, and C of this part, the provisions of this part apply to the owner or operator of any stationary source which contains an

affected facility, the construction or modification of which is commenced after the date of publication in this part of any standard applicable to that family.

The amendments to this subpart do not result in a modification to the current permit requirements. Therefore, the modifications to this subpart are not addressed any further in this evaluation.

The following conditions of the proposed requirements of the draft PTO '-3-24 ensures compliance with this rule.

Permit Unit	Condition #
C-705-3-24	11, 15, 16, and 24

J. 40 CFR Part 60, Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in paragraphs (a)(1) through (4) of this section.

Although there have been changes made to this subpart since the facility's Title V permit was last renewed, such changes did not affect the current permit requirements of permit unit '-17. The following conditions ensure compliance with this regulation.

Permit Unit	Condition #
C-705-17-2	2, 3, 4, 5, 6, and 8

K. 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

Section 63.6590(a) states that an affected source is any existing, new, or reconstructed stationary RICE located at a major source or an area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

Section 63.6590(a)(1)(iii) states that for stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

As seen in Attachment D, the facility is an area source of HAP emissions and the engines associated with permit unit '-2 and '-14 commenced construction or reconstruction before June 12, 2006. Therefore, the engines associated with permit unit '-2 and '-14 are existing stationary RICEs.

Section 63.6590(a)(2)(iii) states that a stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

The facility is an area source of HAP emissions and the engine associated with permit unit '-17 commenced construction after June 12, 2006. Therefore, the engine associated with permit unit '-17 is a new stationary RICE.

Section 63.6590(c) states that an affected source that meets any of the criteria in 40 CFR 63.6590(c)(1) through (7) must meet the requirements of 40 CFR 63 by meeting the requirements of 40 CFR 60 Subpart IIII or 40 CFR 60 JJJJ, whichever is applicable. No further requirements apply for such engines under this part.

The facility is an area source of HAP emissions, and an engine associated with permit unit '-17 is a new or reconstructed stationary RICE. Also, as mentioned above in the 40 CFR 60 Subpart IIII discussion, the engine associated with permit unit '-17 is in compliance with the 40 CFR 60 Subpart IIII requirements. Thus, no further requirements of 40 CFR 63 Subpart ZZZZ apply to the engine associated with permit unit '-17.

Engines associated with permit units '-2 and '-14 do not qualify for exemptions per 40 CFR 63.6590(c). Therefore, 40 CFR 63 ZZZZ requirements will be addressed below.

Although there have been changes made to this subpart since the facility's Title V permit was last renewed, such changes did not affect the current permit requirements of permit units '-2 and '-14, except that Table 2d has been newly added to this subpart. Therefore, only Table 2d will be discussed in this document.

Table 2d to Subpart ZZZZ of Part 63 - Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions		
For Each...	You must meet the following requirement, except, during periods of startup...	During periods of startup you must...
1. Non-Emergency, non-black start CI stationary RICE ≤ 300 HP	<p>a. Change oil and filter every 1,000 hours of operation or within 1 year + 30 days of the previous change, whichever comes first; ¹</p> <p>b. Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary;</p> <p>c. Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary</p>	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
:	:	
4. Emergency stationary CI RICE and black start stationary CI RICE. ²	<p>a. change oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first; ¹</p> <p>b. Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first,</p>	

	<p>and replace as necessary; and</p> <p>c. Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary</p>	
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1. Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) or (j) in order to extend the specified oil change requirement in table 2d of this subpart.

2. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, state or local law under which the risk was deemed unacceptable.

Therefore, the following existing conditions (conditions # 12 through 15 in PTO C-705-2-4 and conditions # 15 through 18 in PTO C-705-14-6) will be revised as follows and will be placed on the draft, renewed PTOs:

- The engine's oil and filter shall be changed every 500 hours of operation or every 12 months + 30 days of the previous change, whichever comes first. [40 CFR 63 Subpart ZZZZ]
- The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months + 30 days of the previous inspection, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ]
- The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months + 30 days of the previous inspection, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ]
- 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 + 30 days of the previous change, whichever comes first. The oil analysis shall be performed every 500 hours of operation or every 12 months + 30 days of the previous analysis, whichever comes first. The

analysis program shall 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]

L. 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)
NOx	20,000
SOx	140,000
PM10	140,000
CO	200,000
VOC	20,000

§64.3 - Monitoring Design Criteria

This section specifies the design criteria for the CAM system. Paragraph (a) (*General criteria*) requires that the CAM system be designed to obtain data for one or more appropriate indicators of emission control system performance and requires the owner to establish appropriate ranges or designated conditions for the selected indicators such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions.

Paragraph (b) (*Performance criteria*) requires the owner or operator to establish and maintain the following:

- Specifications to ensure that representative data are collected.
- Verification procedures for startup of new monitoring equipment.
- Quality assurance and control practices to ensure continuing validity of data.
- Data collection frequency and procedures.

Paragraph (c) (*Evaluation factors*) requires the owner or operator to take into account site-specific factors in the design of the CAM system.

Paragraph (d) (*Special criteria for the use of continuous emission, opacity, or predictive monitoring systems*) requires the owner or operator to use a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS), or a predictive emission monitoring system (PEMS) to satisfy CAM requirements, provided that these monitoring systems are required pursuant to other authority under the Clean Air Act or state or local law. This subsection also stipulates the following:

- The use of a CEMS, COMS, or PEMS that satisfies any of the following monitoring requirements shall be deemed to satisfy the general design criteria in paragraphs (a) and (b) of this section, provided that a COMS may be subject to the criteria for establishing indicator ranges under paragraph (a) of this section:
 - (i) Section 51.214 and appendix P of 40 CFR 51;
 - (ii) Section 60.13 and appendix B of 40 CFR 60;
 - (iii) Section 63.8 and any applicable performance specifications required pursuant to the applicable subpart of 40 CFR 63;
 - (iv) 40 CFR 75;
 - (v) Subpart H and appendix IX of 40 CFR 266; or
 - (vi) In the event that the monitoring system is not subject to any of the requirements listed above, comparable requirements and specifications established by the permitting authority.
- The owner or operator shall design the monitoring system subject to this paragraph (d) to:
 - (i) Allow for reporting of exceedances (or excursions if applicable to a COMS used to assure compliance with a particulate matter standard), consistent with any period for reporting of exceedances in an underlying requirement. If an underlying requirement does not contain a provision for establishing an averaging period for the reporting of exceedances or excursions, the criteria

used to develop an averaging period specified in the data collection procedures required under paragraph (b) of this section shall apply; and

(ii) Provide an indicator range consistent with paragraph (a) of this section for a COMS used to assure compliance with a particulate matter standard. If an opacity standard applies to the pollutant-specific emissions unit, such limit may be used as the appropriate indicator range unless the opacity limit fails to meet the criteria in paragraph (a) of this section after considering the type of control device and other site-specific factors applicable to the pollutant-specific emissions unit.

§64.4 - Submittal Requirements

This section specifies submittal requirements for the owner or operator which ensure the CAM system will comply with the design criteria of §64.3.

§64.5 - Deadlines for Submittals

This section specifies required timing for submittals required under §64.4.

Large pollutant-specific emissions units (those with controlled emissions exceeding major source thresholds) are required to make the submittals as a part of the initial Title V permit application where the application has either not been filed or has not been deemed complete. Where the initial Title V permit has been issued without implementation of 40 CFR 64, the owner or operator must make the required submittals as a part of a subsequent application for any significant permit revision. If the required information is not submitted by either of these deadlines, it must be submitted as a part of the application for the Title V permit renewal.

For *other pollutant-specific emissions units*, the required submittal deadline is the application for Title V permit renewal.

§64.6 - Approval of monitoring

This section stipulates the following:

- A requirement that the permitting authority act to approve the proposed monitoring by confirming that the monitoring submitted complies with the requirements of §64.3
- An allowance for the permitting authority to condition the approval based on collecting additional data on the indicators to be monitored, including performance or compliance testing
- The minimum conditions that must be placed on the permit in the event that the proposed monitoring is approved by the permitting authority including a

milestone schedule for completion of any conditional approval actions required by the owner or operator, such as installations, testing, or verification of operational status

- Actions required by the permitting authority in the event that the proposed monitoring is not approved

The CAM submittal requirements and stipulations for approval of such submittals pursuant to §64.4, §64.5, and §64.6 have been completed in conjunction with the application and review process for this renewal of the Title V permit.

§64.7 - Operation of Approved Monitoring

This section stipulates the following:

- Requirements that the owner or operator 1) commence the monitoring upon receipt of a Title V permit that includes such monitoring, 2) properly maintain the monitoring system, and 3) conduct all monitoring in a continuous mode with the exception of outage periods associated with monitor malfunction and repair and with quality assurance and control activities
- Actions required by the owner or operator in response to excursions or exceedances
- A requirement for the owner or operator to document any need for improved monitoring based upon either an identification of a failure of the monitoring system to identify an excursion or exceedance or upon the results of compliance or performance testing that identifies a need to modify the monitoring

§64.8 - Quality Improvement Plan (QIP) Requirements

This section stipulates that the Administrator or the permitting authority may require that the facility develop and implement a QIP in the event of a determination of a need for improved monitoring pursuant to §64.7. §64.8 also identifies the minimum elements required in the QIP, and requires that the facility implement the QIP as expeditiously as possible, with implementation not exceeding 180 days after the date that the need for implementation was identified unless the permitting authority is notified.

§64.9 - Reporting and Recordkeeping Requirements

This section stipulates the minimum reporting and recordkeeping requirements for facilities subject to 40 CFR 64.

§64.10 - Savings Provisions

This section states that the purpose of 40 CFR 64 is to require, as a part of the issuance of a Title V permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of 40 CFR 64. In addition, §64.10 states that nothing in 40 CFR 64 shall excuse an owner or operator from any other requirements of federal, state or local law or restrict or abrogate the authority of the Administrator or of the permitting authority.

Natural Gas Boiler (C-705-1)

- 1) The boiler has an emissions limit for NO_x, SO_x, PM₁₀, CO, and VOC emissions.
- 2) The boiler is equipped with add-on controls (selective catalytic reduction (SCR) system and flue gas recirculation (FGR)) for NO_x; therefore, the boiler is potentially subject to CAM requirements for NO_x.
- 3) NO_x with SCR and FGR

Pursuant to current PTO C-705-1-11, the NO_x emission concentration limit of this boiler is 5 ppmv @ 3% O₂ (equivalent to 0.0061 lb/MMBtu). Also, the annual heat input to the boiler is limited to 9,000 MMBtu. Thus,

$$\begin{aligned}\text{Controlled Annual NO}_x \text{ PE (lb/yr)} &= \text{Emission Factor (lb/MMBtu)} \times \text{Annual} \\ &\quad \text{Heat Input Limit (MMBtu/yr)} \\ &= 0.0061 \text{ lb-NO}_x\text{/MMBtu} \\ &\quad \times 9,000 \text{ MMBtu/yr} \\ &= 55 \text{ lb-NO}_x\text{/yr}\end{aligned}$$

According to AP 42 Chapter 1.4 *Natural Gas Combustion* (July 1998), an SCR system reduces NO_x emissions from 80 to 90%, and an FGR reduces NO_x emissions from 60 to 90% in conjunction with low NO_x burners. To be conservative, it will be assumed that both add-on controls achieve 90% NO_x reduction respectively. Thus, uncontrolled annual NO_x PE can be calculated as follows:

$$\begin{aligned}\text{Uncontrolled Annual NO}_x \text{ PE (lb/yr)} &= \text{Controlled Annual PE (lb/yr)} \div (1 - \\ &\quad \text{SCR Control Efficiency}) \div (1 - \text{FGR} \\ &\quad \text{Control Efficiency}) \\ &= 55 \text{ lb/yr} \div (1 - 0.9) \div (1 - 0.9) \\ &= 5,500 \text{ lb-NO}_x\text{/yr}\end{aligned}$$

Since the uncontrolled NOx PE for the boiler is less than the major source threshold of 20,000 lb-NOx/yr, the boiler is not subject to CAM requirements for NOx.

Emergency Diesel IC Engines (C-705-2 and '-17)

- 1) Each engine has an emissions limit for NOx, SOx, PM10, CO, and VOC emissions.
- 2) The engines are not equipped with any add-on control; therefore, the engines are not subject to CAM requirements.

Nitric Acid Plant (C-705-3)

- 1) This permit has an emissions limit for NOx, SOx, PM10, CO, and VOC emissions.
- 2) There is an add-on control device (non-SCR) associated with this permit unit for NOx emissions; therefore, this permit is potentially subject to CAM requirements for NOx.
- 3) NOx with NO₂ to N₂ butane gas combustor (Non-SCR)

Pursuant to current PTO C-705-3-21, the NOx emissions are limited to 0.78 lb/ton of 100% HNO₃ on a 12 month rolling average. In addition, the maximum nitric acid production is limited to 280 ton of 100% HNO₃/day, based on a 12 month rolling average. Thus,

$$\begin{aligned} \text{Controlled Annual NOx PE} &= \text{Emission Factor (lb/ton of HNO}_3\text{)} \times \\ &\quad \text{Throughput (ton of HNO}_3\text{/day)} \times \\ &\quad \text{Operation (day/yr)} \\ &= 0.78 \text{ lb/ton} \times 280 \text{ ton/day} \times 365 \text{ day/yr} \\ &= 79,716 \text{ lb-NOx/yr} \end{aligned}$$

The District had previously determined that the equipped NSCR achieves at least 95% control for NOx emissions. Thus, uncontrolled annual NOx PE can be calculated as follows:

$$\begin{aligned} \text{Uncontrolled Annual NOx PE (lb/yr)} &= \text{Controlled Annual PE (lb/yr)} \div (1 - \\ &\quad \text{NSCR Control Efficiency)} \\ &= 79,716 \text{ lb/yr} \div (1 - 0.95) \\ &= 1,594,320 \text{ lb-NOx/yr} \end{aligned}$$

Since the uncontrolled annual NOx PE is greater than the NOx major source threshold of 20,000 lb/yr, this permit unit is subject to CAM.

However, pursuant to 40 CFR 64.3(d)(1), if a continuous emission monitoring system (CEMS) is required pursuant to other authority under the ACT or state or local law, the owner or operator should use such system to satisfy the requirements of this part, and the unit is equipped with a CEMS required by the current PTO C-705-3-21. Therefore, requirements of 40 CFR 64 are satisfied and continued compliance is expected.

Calcium Ammonium Nitrate Plant (C-705-4)

- 1) The unit has an emissions limit for PM10 emissions.
- 2) The unit is equipped with an add-on control (scrubbers); therefore, this unit is potentially subject to CAM requirements.
- 3) PM10 with Scrubbers

Pursuant to the current PTO C-705-4-11, PM10 emissions rate for this permit unit is 0.004 lb-PM10/ton of liquid fertilizer solution. Also, the maximum daily production rate is limited to 500 tons of liquid fertilizer solution. Thus,

$$\begin{aligned}\text{Controlled Annual PM10 PE} &= \text{Emission Factor (lb/ton)} \times \text{Throughput} \\ &\quad (\text{ton/day}) \times \text{Operation (day/yr)} \\ &= 0.004 \text{ lb/ton} \times 500 \text{ ton/day} \times 365 \text{ day/yr} \\ &= 730 \text{ lb-PM10/yr}\end{aligned}$$

According to AP 42 Chapter 8.3 *Ammonium Nitrate* (January 1995), for neutralizer processes, wet scrubbers are able to achieve 95% PM emissions control. To be conservative, it will be assumed that 100% PM is PM10. Thus, uncontrolled annual PM10 PE can be calculated as follows:

$$\begin{aligned}\text{Uncontrolled Annual PM10 PE (lb/yr)} &= \text{Controlled Annual PE (lb/yr)} \div (1 - \\ &\quad \text{Web Scrubber Control Efficiency}) \\ &= 730 \text{ lb/yr} \div (1 - 0.95) \\ &= 14,600 \text{ lb-PM10/yr}\end{aligned}$$

Since the uncontrolled PM10 PE for this permit unit is less than the major source threshold of 140,000 lb-PM10/yr, this permit unit is not subject to CAM requirements for PM10.

Liquid Ammonium Phosphate Unit (C-705-5)

- 1) The unit has an emissions limit for PM10 emissions.
- 2) The unit is equipped with an add-on control (scrubbers); therefore, this unit is potentially subject to CAM requirements.
- 3) PM10 with Scrubbers

Pursuant to the current PTO C-705-5-10, PM10 emissions rate for this permit unit is 0.001 lb-PM10/ton of liquid fertilizer solution. Also, the maximum annual production rate is limited to 120,000 tons of liquid fertilizer solution. Thus,

$$\begin{aligned}\text{Controlled Annual PM10 PE} &= \text{Emission Factor (lb/ton)} \times \text{Throughput (ton/yr)} \\ &= 0.001 \text{ lb/ton} \times 120,000 \text{ ton/yr} \\ &= 120 \text{ lb-PM10/yr}\end{aligned}$$

According to AP 42 Chapter 8.5.3 *Ammonium Phosphate* (January 1995), emission control efficiencies for ammonium phosphate plant control equipment are reported as 75 to 99.8 percent for particulates. To be conservative, it will be assumed that 100% PM is PM10 and the control equipment achieves 99.8 percent particulate control. Thus, uncontrolled annual PM10 PE can be calculated as follows:

$$\begin{aligned}\text{Uncontrolled Annual PM10 PE (lb/yr)} &= \text{Controlled Annual PE (lb/yr)} \div (1 - \text{Wet Scrubber Control Efficiency}) \\ &= 120 \text{ lb/yr} \div (1 - 0.998) \\ &= 60,000 \text{ lb-PM10/yr}\end{aligned}$$

Since the uncontrolled PM10 PE for this permit unit is less than the major source threshold of 140,000 lb-PM10/yr, this permit unit is not subject to CAM requirements for PM10.

Ammonium Nitrate Plant (C-705-6)

- 1) The unit has an emissions limit for PM10 emissions.
- 2) The unit is equipped with an add-on control (scrubber); therefore, this unit is potentially subject to CAM requirements.
- 3) PM10 with a Scrubber

The plant engineer had previously stated that the maximum daily production rate of this operation as designed is 350 ton of liquid fertilizer solution.

Also, according to AP 42 Chapter 8.3 *Ammonium Nitrate* (January 1995), for neutralizer processes, controlled PM emissions are ranged from 0.004 to 0.43 lb/ton of product. Given that the emissions from this operation is controlled by triple stages natural draft scrubbers, the District will assume very low or negligible particulate emissions from this operation, and, therefore, an emission factor of 0.004 lb/ton of product will be used for the calculations. Thus,

$$\begin{aligned}\text{Controlled Annual PM}_{10} \text{ PE} &= \text{Emission Factor (lb/ton)} \times \text{Throughput} \\ &\quad (\text{ton/day}) \times \text{Operation (day/yr)} \\ &= 0.004 \text{ lb/ton} \times 350 \text{ ton/yr} \times 365 \text{ day/yr} \\ &= 511 \text{ lb-PM}_{10}/\text{yr}\end{aligned}$$

According to AP 42 Chapter 8.3 *Ammonium Nitrate* (January 1995), for neutralizer processes, wet scrubbers are able to achieve 95% PM emissions control. To be conservative, it will be assumed that 100% PM is PM₁₀. Thus, uncontrolled annual PM₁₀ PE can be calculated as follows:

$$\begin{aligned}\text{Uncontrolled Annual PM}_{10} \text{ PE (lb/yr)} &= \text{Controlled Annual PE (lb/yr)} \div (1 - \\ &\quad \text{Wet Scrubber Control Efficiency}) \\ &= 511 \text{ lb/yr} \div (1 - 0.95) \\ &= 10,220 \text{ lb-PM}_{10}/\text{yr}\end{aligned}$$

Since the uncontrolled PM₁₀ PE for this permit unit is less than the major source threshold of 140,000 lb-PM₁₀/yr, this permit unit is not subject to CAM requirements for PM₁₀.

Monoammonium Phosphate and Ammonium Phosphate Dry Fertilizer Railcar and Truck Receiving, Unloading, and Storage Operations (C-705-11, '-12, and '-13)

- 1) Each permit unit has an emissions limit for PM₁₀ emissions.
- 2) There is no add-on control equipped with these permit units; therefore, they are not subject to CAM requirements.

Emergency Diesel IC Engine with Positive Crankcase Ventilation (PCV) (C-705-14)

- 1) The engine has an emissions limit for NO_x, SO_x, PM₁₀, CO, and VOC emissions.

2) This engine is equipped with a PCV for VOC and PM10 emissions control. Therefore, this engine is potentially subject to CAM requirements for PM10 and VOC.

3) a. PM10 with PCV

Pursuant to current PTO C-705-14-6, the controlled PM10 emission factor is 1.49 g/bhp-hr, and the engine is rated at 1,200 bhp. In addition, the engine operation is limited to 20 hours per year for maintenance, testing, and required regulatory purposes. Therefore, the controlled PE for PM10 can be calculated as follows:

$$\begin{aligned}\text{Controlled Annual PM10 PE} &= \text{Emission Factor (g/bhp-hr)} \times \text{bhp} \times \\ &\quad \text{Operation (hr/yr)} \div \text{Conversion Factor} \\ &\quad \text{(g/lb)} \\ &= 1.49 \text{ g/bhp-hr} \times 1,200 \text{ bhp} \times 20 \text{ hr/yr} \\ &\quad \div 453.6 \text{ g/lb} \\ &= 79 \text{ lb-PM10/yr}\end{aligned}$$

Current PTO '-14-6 requires the engine to be equipped with a PCV system or a crankcase emissions control device that can achieve at least 90%. Thus, the uncontrolled PE for PM10 can be calculated as follows:

$$\begin{aligned}\text{Uncontrolled Annual PM10 PE} &= \text{Controlled Annual PM10 PE (lb/yr)} \\ &\quad \div (1 - \text{Control Efficiency}) \\ &= 79 \text{ lb/yr} \div (1 - 0.90) \\ &= 790 \text{ lb-PM10/yr}\end{aligned}$$

Since the uncontrolled PM10 PE for this engine is less than the major source threshold of 140,000 lb-PM10/yr, this engine is not subject to CAM requirements for PM10.

b. VOC with PCV

Pursuant to AP 42 Chapter 3.3 *Gasoline and Diesel Industrial Engines* (April 2025), the uncontrolled total organic carbon (TOC) emission factor for diesel fueled engines is 0.00247 lb/hp-hr. Given that TOC is a broader measurement than VOC, to be conservative, it will be assumed that VOC emission factor from diesel fueled engines is 0.00247 lb/hp-hr.

Based on the current PTO '-14-6, the engine is rated at 1,200 bhp. Also, the engine operation is limited to 20 hours per year for maintenance, testing, and required regulatory purposes. Therefore, the uncontrolled PE for VOC can be calculated as follows:

$$\begin{aligned}\text{Uncontrolled Annual VOC PE} &= \text{Emission Factor (lb/bhp-hr)} \times \text{bhp} \times \\ &\quad \text{Operation (hr/yr)} \\ &= 0.00247 \text{ lb/bhp-hr} \times 1,200 \text{ bhp} \\ &\quad \times 20 \text{ hr/yr} \\ &= 59 \text{ lb-VOC/yr}\end{aligned}$$

Since the uncontrolled VOC PE for this engine is less than the major source threshold of 20,000 lb-VOC/yr, this engine is not subject to CAM requirements for VOC.

Limestone Receiving Operation (C-705-15)

- 1) There are a total of 3 emissions units (i.e., truck unloading, railcar pneumatic conveyance system, and railcar unloading shed) associated with this permit unit and each permit unit has an emissions limit for PM10 emissions.
- 2) Only the following emissions units are equipped with an add-on control: truck unloading and railcar pneumatic conveyance system. Therefore, the two units are potentially subject to CAM requirements for PM10.
- 3) a. Truck Unloading Railcar with a Bin Vent Filter

PTO '-15-3 has a permit condition limiting PM10 emissions from the bin vent filter to 0.01 grain/dscf. Also, the applicant had previously stated that the flow rate for the pneumatic truck unloading is 1,500 dscf per truck. Thus,

$$\begin{aligned}\text{Controlled Annual PM10 PE} &= \text{Emission Factor (grain/dscf)} \times \text{Flow Rate} \\ &\quad \text{(dscf/truck)} \times \text{Conversion Factor (lb/grain)} \\ &\quad \times \text{Operation (hr/day)} \\ &= 0.01 \text{ grain/dscf} \times 1,500 \text{ dscf/truck} \\ &\quad \times 1 \text{ lb/7,000 grain} \times 8,760 \text{ hr/yr} \times 1 \text{ truck/hr} \\ &= 19 \text{ lb-PM10/yr}\end{aligned}$$

According to the initial permit application for permit unit '-15, the bin vent filter manufacturer guaranteed 99.9% control efficiency on particles of 2 micron and larger.

$$\begin{aligned}\text{Uncontrolled Annual PM10 PE} &= \text{Controlled PM10 PE (lb/yr)} \div (1 - \text{Bin Vent} \\ &\quad \text{Filter Control Efficiency}) \\ &= 19 \text{ lb/yr} \div (1 - 0.999) \\ &= 19,000 \text{ lb/yr}\end{aligned}$$

Since the uncontrolled PM10 PE for this permit unit is less than the major source threshold of 140,000 lb-PM10/yr, this permit unit is not subject to CAM requirements for PM10.

b. Railcar Pneumatic Conveyance System with a Baghouse

PTO '15-3 has a permit condition limiting PM10 emissions from the baghouse to 0.01 grain/dscf. Also, the applicant had previously stated that the flow rate for the pneumatic railcar conveyance system is 1,600 dscf per minute. Thus,

$$\begin{aligned}\text{Controlled Annual PM10 PE} &= \text{Emission Factor (grain/dscf)} \times \text{Flow Rate} \\ &\quad (\text{dscf/min}) \times \text{Conversion Factor (lb/grain)} \times \\ &\quad \text{Operation (min/yr)} \\ &= 0.01 \text{ grain/dscf} \times 1,600 \text{ dscf/min} \\ &\quad \times 1 \text{ lb/7,000 grain} \times 262,800 \text{ min/yr} \\ &= 601 \text{ lb-PM10/yr}\end{aligned}$$

Per District practice, a 99% of particulate matter control efficiency will be assumed for the baghouse. To be conservative, it will be assumed that 100% PM is PM10. Thus, uncontrolled annual PM10 PE can be calculated as follows:

$$\begin{aligned}\text{Uncontrolled Annual PM10 PE} &= \text{Controlled PM10 PE (lb/yr)} \div \text{Bin Vent} \\ &\quad \text{Filter Control Efficiency (\%)} \\ &= 601 \text{ lb/yr} \div (1 - 0.99) \\ &= 60,100 \text{ lb/yr}\end{aligned}$$

Since the uncontrolled PM10 PE for this permit unit is less than the major source threshold of 140,000 lb-PM10/yr, this permit unit is not subject to CAM requirements for PM10.

M. 40 CFR Part 68 - Chemical Accident Prevention Provisions

This part 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). The list of substances, threshold quantities, and accident prevention regulations promulgated under this part do not limit in any way the general duty provisions under section 112(r)(1).

The amendments to this subpart do not result in a modification to the current permit requirement included as condition 42 of draft permit requirements of

draft facility-wide permit C-705-0-5. Therefore, the modifications to this subpart are not addressed any further in this evaluation.

N. 40 CFR Part 82, Subpart B - Servicing of Motor Vehicle Air Conditioners

The purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Clean Air Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances.

These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this subpart do not result in a modification to the current permit requirement included as condition 28 of draft permit requirements of draft facility-wide permit C-705-0-5. Therefore, the modifications to this subpart are not addressed any further in this evaluation.

O. 40 CFR Part 82, Subpart F - Recycling and Emission Reduction

The purpose of 40 CFR Part 82 Subpart F is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

These regulations apply to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

The amendments to this subpart do not result in a modification to the current permit requirement included as condition 27 of draft permit requirements of draft facility-wide permit C-705-0-5. Therefore, the modifications to this subpart are not addressed any further in this evaluation.

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.

C. Obsolete Permit Shields From Existing Permit Requirements

On the proposed renewed facility-wide operating permit C-705-0-5, condition #39 was modified to remove rescinded and inapplicable county breakdown rules as previously described Section VIII. A. of this evaluation. Also, condition 40 was modified as indicated below to remove reference to the December 17, 2009 version of District Rule 4601, Architectural Coatings and the August 19, 2004 version of District Rule 8051, Open Areas:

- 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]

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. HAP Major Source Determination

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: C-705-0-5

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]
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]
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] 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 (12/18/2014). [District Rules 2010 and 2020] Federally Enforceable Through Title V Permit
5. {4366} 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. {4367} 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]
8. {4369} 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. {4370} 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
C-705-0-5 : 2/18/2026 9:50:52 AM -- HONGM

10. {4371} 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 (6/20/24). [District Rules 1100 and 2520] Federally Enforceable Through Title V Permit
12. {4373} 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. {4374} 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. {4375} 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. {4376} 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. {4377} 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. {4378} 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. {4379} 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. {4380} 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. {4381} 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. {4382} 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. {4383} 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, market, sell, solicit or apply any architectural coating or colorant with a VOC content in excess of the applicable limits specified in Table 1 (Coatings) and Table 2 (Colorants) of District Rule 4601 (4/16/20), unless exempted under section 4.0 of District Rule 4601 (4/16/20). [District Rule 4601] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (4/16/20) shall be stored in closed containers when not in use. [District Rule 4601] 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 (4/16/20). [District Rule 4601] Federally Enforceable Through Title V Permit
26. {4387} 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. {4388} 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. {4389} 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. {4390} 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. {4391} 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. {4392} 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 (9/21/2023) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. {4394} 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. {4395} 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. {4396} 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. {4397} 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. {4398} 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. {4399} 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) and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520] 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 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
41. {98} 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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-1-12

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 Rules 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, 2,000 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] Federally Enforceable Through Title V Permit
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

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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-705-2-5

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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] 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 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
12. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months + 30 days of the previous change, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
13. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months + 30 days of the previous inspection, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
14. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months + 30 days of the previous inspection, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
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 + 30 days of the previous change, whichever comes first. The oil analysis shall be performed every 500 hours of operation or every 12 months + 30 days of the previous analysis, whichever comes first. The analysis program shall 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 shall 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 shall change the oil within 2 days or before commencing operation, whichever is later. The owner or operator shall 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 shall be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
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 40 CFR 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
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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-3-24

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 shall be conducted at least once every twelve months 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, 2,000 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 60.11(c) and 40 CFR 60.72(a)] 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 Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x concentrations during startups and shutdowns, as well as during normal operating conditions. The CEMS shall meet requirements in 40 CFR Part 60, Appendix B Performance Specification 2 or equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rules 1080 and 2201] Federally Enforceable Through Title V Permit
15. When the plant is in operation, the monitoring system shall perform a daily calibration drift test in accordance with 40 CFR 60.13(d). [40 CFR 60.13(d) and 60.73(a)] Federally Enforceable Through Title V Permit
16. 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. [District Rule 1080 and 40 CFR 60.13(e)(2)] Federally Enforceable Through Title V Permit
17. 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
18. 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
19. 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
20. 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
21. 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
22. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. 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. [District Rules 1070 and 1080, and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
24. 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
25. 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
26. 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
27. 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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-4-12

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 of liquid fertilizer solution/day. [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-705-5-11

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-705-6-5

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-705-11-7

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-705-12-7

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-705-13-5

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-705-14-7

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, 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, 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 shall 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 + 30 days of the previous change, 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 + 30 days of the previous inspection, 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 + 30 days of the previous inspection, 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 + 30 days of the previous change, whichever comes first. The oil analysis shall be performed every 500 hours of operation or every 12 months + 30 days of the previous analysis, whichever comes first. The analysis program shall 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 shall 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 shall change the oil within 2 days or before commencing operation, whichever is later. The owner or operator shall 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 shall 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 40 CFR 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-15-4

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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-17-2

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, 17 CCR 93115, and 40 CFR Part 60 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, and 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.

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.

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ATTACHMENT B

Previous Title V Operating Permit

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
C-705-0-4 : 8/7/2025 3:28:00 PM -- HONGM

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-SO_x/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 (NO_x) 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 SO_x 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 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-705-5-10

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-705-4-11

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-705-6-4

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-705-12-6

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-705-11-6

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-705-13-4

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.

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 C

Detailed Summary List of Facility Permits

Detailed Facility Report

For Facility=705

Sorted by Facility Name and Permit Number

J R SIMPLOT COMPANY 12688 S COLORADO AVE HELM, CA 93627	Fac #: C-705 Status: A Phone: 5598665681	Type: TitleV Toxic ID: 40139	Expiration: 11/30/2025 Area: 4 / Insp. Date: 07/26
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Permit #	Fee Description	Fee Rule	Fee Amount	Permit Status	Equipment Description
1-11	71.4 MMBTU/HR U.I.W. BOILER	3020-02 H	1,338.00	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
2-4	469.0 HP I.C. ENGINE	3020-10 D	624.00	A	469 BHP (INTERMITTENT) CATERPILLAR MODEL 3406 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR
3-21	6.87 MMBTU/HR NITRIC ACID PLNT	3020-02 G	1,059.00	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
4-11	1230.0 HP #3 PHOS ACID PLANT	3020-01 G	1,059.00	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
5-10	167.5 hp	3020-01 D	410.00	A	LIQUID AMMONIUM PHOSPHATE (10-34-0) UNIT INCLUDING REACTOR VESSEL, SECONDARY SCRUBBER, CENTRIFUGAL FAN, HEAT EXCHANGERS, FOUR STORAGE TANKS, AND ASSOCIATED PUMPS.
6-4	190.0 HP AMMO-NITRATE PLANT	3020-01 D	410.00	A	190.0 HP AMMONIUM NITRATE PLANT INCLUDING AMMONIA VAPORIZER, NEUTRALIZER, SURGE TANK, SCRUBBER, CONDENSER, AND VENT SCRUBBER
7-1	1385.0 HP BALL MILL	3020-01 G	1,059.00	D	1,385.0 HP BALL MILL WITH BALL MILL DRIVE, FEEDER AND DISCHARGE ELEVATORS, HOISTS, CONVEYORS, AIRSLIDE BLOWER, NORBLO FAN, SEPARATOR, GENERATOR, AND FEEDERS SERVED BY A 20,000 CFM BAGHOUSE.
8-1	ONE GASOLINE DISPENSING NOZZLE	3020-11 A	0.00	D	500 GALLON CONVAULT D-500 ABOVEGROUND STORAGE TANK WITH COAXIAL PHASE I VAPOR RECOVERY SYSTEM (G-70-116) WITH ONE GASOLINE DISPENSING NOZZLE (EXEMPT FROM PHASE II VAPOR RECOVERY SYSTEM REQUIREMENTS).
10-3	157 HP DIESEL-FIRED IC ENGINE	3020-10 B	155.00	D	157 BHP (INTERMITTENT) PERKINS MODEL PDFP-L6YW-2506 DIESEL-FIRED EMERGENCY IC ENGINE DRIVING A FIRE WATER PUMP
11-6	121.0 HP UNLOADING OPERATION	3020-01 D	410.00	A	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
12-6	122.5 HP UNLOADING OPERATION	3020-01 D	410.00	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
13-4	72.5 HP UNLOADING SHED	3020-01 C	259.00	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
14-6	1200 hp Detroit Diesel engine	3020-10 F	972.00	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
15-3	125 HP	3020-01 D	410.00	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

Detailed Facility Report

For Facility=705

Sorted by Facility Name and Permit Number

Permit ID	Equipment Description	Permit Number	Capacity/Power	Category	Notes
16-1	55 mmbtu/hr	3020-02 H	1,338.00	D	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
17-1	175 bhp IC engine	3020-10 B	155.00	A	55 MMBTU/HR BABCOCK AND WILCOX MODEL FMO-66 NATURAL GAS-FIRED BOILER WITH TODD VARIFLAME LOW NOX BURNER, USED AS TEMPORARY REPLACEMENT EMISSIONS UNIT (TREU) FOR PERMIT UNIT C-705-1-5 175 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

HAP Major Source Determination

Facility HAP Totals

CAS	Pollutant Name	Emissions	Major HAP
75070	Acetaldehyde	1.07E-04 TON/YR	<input type="checkbox"/>
107028	Acrolein	9.34E-05 TON/YR	<input type="checkbox"/>
7440382	Arsenic	3.55E-06 TON/YR	<input type="checkbox"/>
71432	Benzene	2.01E-04 TON/YR	<input type="checkbox"/>
7440439	Cadmium	2.33E-05 TON/YR	<input type="checkbox"/>
7440484	Cobalt	7.50E-07 TON/YR	<input type="checkbox"/>
100414	Ethyl benzene	2.39E-04 TON/YR	<input type="checkbox"/>
50000	Formaldehyde	4.25E-04 TON/YR	<input type="checkbox"/>
110543	Hexane {n-Hexane}	1.59E-04 TON/YR	<input type="checkbox"/>
7439921	Lead	3.57E-07 TON/YR	<input type="checkbox"/>
7439976	Mercury	1.06E-08 TON/YR	<input type="checkbox"/>
91203	Naphthalene	1.04E-05 TON/YR	<input type="checkbox"/>
7440020	Nickel	4.09E-05 TON/YR	<input type="checkbox"/>
1151	PAHs, total, w/o individ. components reported [Treated	3.46E-06 TON/YR	<input type="checkbox"/>
7782492	Selenium	5.00E-08 TON/YR	<input type="checkbox"/>
108883	Toluene	9.17E-04 TON/YR	<input type="checkbox"/>
1330207	Xylenes (mixed)	6.81E-04 TON/YR	<input type="checkbox"/>
TOTAL		2.91E-03 TON/YR	<input type="checkbox"/>