

STATIONARY SOURCE SUMMARY

(FORM 900-A1)

RECEIVED

DISTRICT: **IMPERIAL COUNTY**

JUL 09 2020

COMPANY NAME: **Spreckels Sugar Company Inc,**

AIR POLLUTION
CONTROL DISTRICT

▶ DISTRICT USE ONLY ◀

District ID: _____

Application #: _____

Application Received: _____

Application Filing Fee: _____

Application Deemed Complete: _____

I. FACILITY IDENTIFICATION

1. Facility Name: **Spreckels Sugar Company Inc.**
2. Four digit SIC Code: **2063** EPA Plant ID: **CAD008494460**
3. Parent Company (if different than Facility Name): **Southern Minnesota Beet Sugar Company**
4. Mailing Address: **P.O. Box 581, Brawley Ca 92227**
5. Street Address or Source Location: **395 W. Keystone Road, Brawley, Ca 92227**
6. UTM Coordinates (if required):
7. Source located within: 50 miles of the state line Yes No
50 miles of a Native American Nation Not Applicable Yes No
8. Type of Organization: Corporation Sole Ownership Government Partnership Utility Company
9. Legal Owner's Name: **Southern Minnesota Beet Sugar Company**
10. Owner's Agent Name (if any):
11. Responsible Official: **Greg Martin**
12. Plant Site Manager/Contact: **Greg Martin** Telephone #: **760 344-3110**
13. Type of facility: **Sugar Beet Process Plant**
14. General description of processes/products: **process raw sugar from sugar beets**
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see attachment A)? Yes No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? Not Applicable Yes No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

STATIONARY SOURCE SUMMARY (FORM 900-A2)

DISTRICT: <p style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</p>	▷ DISTRICT USE ONLY ◁ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial Title V Application		
<input checked="" type="checkbox"/> Permit Renewal	1679 A	01-11-2021
<input type="checkbox"/> Significant Permit Modification		
<input type="checkbox"/> Minor Permit Modification		
<input type="checkbox"/> Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve: a:
- | | |
|----------------------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> Portable Source | <input type="checkbox"/> Voluntary Emissions Caps |
| <input type="checkbox"/> Acid Rain Source | <input type="checkbox"/> Alternative Operating Scenarios |
| <input type="checkbox"/> Source Subject to MACT Requirements [Section 112] | |
- b: None of the options in 1.a. are applicable
2. Is source operating under Compliance Schedule? Yes No

3. For permit modifications, provide a general description of the proposed permit modification: _____

COMBUSTION EMISSION UNIT (FORM 900-C1)

DISTRICT: <p style="text-align: center; font-weight: bold;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc</p>

I. PERMIT NUMBER: V-1697A / #1697C-2

II. EMISSION UNIT DESCRIPTION

1. Equipment type: Natural Gas Fired Steam Boiler
2. Equipment description: Natural Gas Fired Steam Boiler
3. Equipment make, model & serial number: Riley Stoker, Model P76-36-WWW; Serial # NB1161
4. Maximum design process rate or maximum power input/output: 194.5 mmBtu/hr
5. Primary use: generate steam for the production of sugar from sugar beets
6. Burner(s) design, operating temperature and capacity: _____
7. Control device(s) type and description (if any): low-NOx burners

OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 3300 (hours/year)
2. Exhaust gas properties (temperature, SCFM, %H₂O, %O₂ or %CO₂, % excess air): Stack Temp - 385 F;
%O₂ - 3.92; 2675 SCFM

3. Fuel specifications:

FUEL TYPE (name)	ANNUAL USAGE (c.f./yr, lb/yr, gal/yr)	HEATING VALUE (BTU/lb or BTU/gal)	SULFUR (%)	NITROGEN (%)
Natural Gas	591716.3 MCF	166.46 MMBtu/hr	< 1	

COMBUSTION EMISSION UNIT (FORM 900-C2)

DISTRICT: <p style="text-align: center; font-weight: bold;">IMPERIAL COUNTY</p>	▷ DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc.</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions	CO	PM10	SOx	ROC	NOx
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³	16.02 lbs/hr	1.45 lbs/hr	0.11 lbs/hr	1.05 lbs/hr	7 lbs/hr
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement.					

COMBUSTION EMISSION UNIT (FORM 900-C1)

DISTRICT: <p style="text-align: center; font-weight: bold;">IMPERIAL COUNTY</p>	<p style="text-align: center;">▶ DISTRICT USE ONLY ◀</p> DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc</p>

I. PERMIT NUMBER: V-1697A

II. EMISSION UNIT DESCRIPTION

1. Equipment type: Natural Gas Fired Steam Boiler
2. Equipment description: Natural Gas Fired Steam Boiler
3. Equipment make, model & serial number: Combustion Engineering, Model #30-A-15. Type A Serial # NB110504
4. Maximum design process rate or maximum power input/output: 202 MMBtu/hr
5. Primary use: Used in the process of producing raw sugar from sugar beets
6. Burner(s) design, operating temperature and capacity: _____
7. Control device(s) type and description (if any): Flue Gas Recirculation

OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 3300 (hours/year)
2. Exhaust gas properties (temperature, SCFM, %H₂O, %O₂ or %CO₂, % excess air): SCFM 2,816; %O₂ 3.22

3. Fuel specifications:

FUEL TYPE (name)	ANNUAL USAGE (c.f./yr, lb/yr, gal/yr)	HEATING VALUE (BTU/lb or BTU/gal)	SULFUR (%)	NITROGEN (%)
Natural Gas	582786.86 MCF	1028 Btu/cf	< 1	

COMBUSTION EMISSION UNIT (FORM 900-C2)

DISTRICT: <p style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions	PM10	SOx	NOx		
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³	10 lbs/hr	200 lbs/hr	7.272 lbs/hr		

OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					

¹ For permit modifications only; emissions prior to project modification.

² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.).

³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement.

COMBUSTION EMISSION UNIT (FORM 900-C1)

DISTRICT: <p style="text-align: center; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar</p>

I. PERMIT NUMBER: V-1697A

II. EMISSION UNIT DESCRIPTION

1. Equipment type: Boiler
2. Equipment description: Natural Gas-fired Steam Boiler, Fuel Oil as Standby
3. Equipment make, model & serial number: Union, Model MH7054, SN NB23380
4. Maximum design process rate or maximum power input/output: 94 MMBtu/hr
5. Primary use: Power for sugar beet processing
6. Burner(s) design, operating temperature and capacity: Coen Daz 30
7. Control device(s) type and description (if any): Flue Gas Recirculation

III. OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 8670 (hours/year)
2. Exhaust gas properties (temperature, SCFM, %H₂O, %O₂ or %CO₂, % excess air): _____

3. Fuel specifications:

FUEL TYPE (name)	ANNUAL USAGE (c.f./yr, lb/yr, gal/yr)	HEATING VALUE (BTU/lb or BTU/gal)	SULFUR (%)	NITROGEN (%)
natural gas	varies			

COMBUSTION EMISSION UNIT (FORM 900-C2)

DISTRICT: <p style="text-align: center; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions	NOx	SOx	PM10		Union Boiler
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³	30ppm@3% ₂	200lb/hr	10lb/hr		
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement.					

COMBUSTION EMISSION UNIT (FORM 900-C1)

DISTRICT: <p style="text-align: center; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar</p>

I. PERMIT NUMBER: V-1697A/ATC low NOx

II. EMISSION UNIT DESCRIPTION

1. Equipment type: Boiler, Auxilliary-backup if any one of the other three boilers is out of service
2. Equipment description: Natural Gas-fired Steam Boiler
3. Equipment make, model & serial number: CE Model 22-VP-12-WP, SN90673-2 NB110529
4. Maximum design process rate or maximum power input/output: 88.5 MMBtu/hr
5. Primary use: Power for sugar beet processing
6. Burner(s) design, operating temperature and capacity: COEN DAZ-30
7. Control device(s) type and description (if any): Flue Gas Recirculation

.I. OPERATIONAL INFORMATION

1. Operating schedule: as needed (hours/day) as needed (hours/year)
2. Exhaust gas properties (temperature, SCFM, %H2O, %O2 or %CO2, % excess air): _____

3. Fuel specifications:

FUEL TYPE (name)	ANNUAL USAGE (c.f./yr, lb/yr, gal/yr)	HEATING VALUE (BTU/lb or BTU/gal)	SULFUR (%)	NITROGEN (%)
natural gas				

COMBUSTION EMISSION UNIT (FORM 900-C2)

DISTRICT: <div style="text-align: center; font-size: 1.2em; color: #0070C0;">IMPERIAL COUNTY</div>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <div style="text-align: center; font-size: 1.2em; color: #0070C0;">Spreckels Sugar Company, Inc.</div>	FACILITY NAME: <div style="text-align: center; font-size: 1.2em; color: #0070C0;">Spreckels Sugar</div>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions	NOx	PM10			Aux Boiler
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³	30ppm@3%	1lb/hr			
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
<small> ¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement. </small>					

COMBUSTION EMISSION UNIT (FORM 900-C1)

DISTRICT: <p style="text-align: center; font-weight: bold;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc</p>

I. PERMIT NUMBER: V-1697A

II. EMISSION UNIT DESCRIPTION

1. Equipment type: Lime Kiln
2. Equipment description: Vertical coke/coal fired lime kiln
3. Equipment make, model & serial number: Fuller-Beckenbach Mixed Feed Kiln; serial # 11-82-20333747
4. Maximum design process rate or maximum power input/output: N/A
5. Primary use: Calcine lime rock and supply CO2 to process
6. Burner(s) design, operating temperature and capacity: N/A
7. Control device(s) type and description (if any): Baghouse and thermal oxidizer (chared with Belgium Lime Kiln)

OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 3300 (hours/year)
2. Exhaust gas properties (temperature, SCFM, %H2O, %O2 or %CO2, % excess air): Exhaust is collected
scrubbed and ran through the thermal oxidizer

3. Fuel specifications:

FUEL TYPE (name)	ANNUAL USAGE (c.f./yr, lb/yr, gal/yr)	HEATING VALUE (BTU/lb or BTU/gal)	SULFUR (%)	NITROGEN (%)
coke/coal	varies			

COMBUSTION EMISSION UNIT (FORM 900-C2)

DISTRICT: <div style="text-align: center; color: blue; font-weight: bold;">IMPERIAL COUNTY</div>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <div style="text-align: center; color: blue; font-weight: bold;">Spreckels Sugar Company, Inc.</div>	FACILITY NAME: <div style="text-align: center; color: blue; font-weight: bold;">Spreckels Sugar</div>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions	NOx	SOx	TSP		Lime Kiln
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³	250 lbs/day	250 lbs/day	250 lbs/day		
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.] required by any applicable federal requirement.					

COMBUSTION EMISSION UNIT (FORM 900-C1)

DISTRICT: <p style="text-align: center; font-weight: bold;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold;">Spreckels Sugar Company Inc</p>

I. PERMIT NUMBER: V-1697A

II. EMISSION UNIT DESCRIPTION

1. Equipment type: Lime Kiln
2. Equipment description: Vertical coke/coal fired lime kiln
3. Equipment make, model & serial number: Belgium, Model and serial # NA
4. Maximum design process rate or maximum power input/output: N/A
5. Primary use: Calcine lime rock and supply CO2 to process
6. Burner(s) design, operating temperature and capacity: N/A
7. Control device(s) type and description (if any): Baghouse and thermal oxidizer (chared with Belgium Lime Kiln)

OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 3300 (hours/year)
2. Exhaust gas properties (temperature, SCFM, %H2O, %O2 or %CO2, % excess air): Exhaust is collected
scrubbed and ran through the thermal oxidizer

3. Fuel specifications:

FUEL TYPE (name)	ANNUAL USAGE (c.f./yr, lb/yr, gal/yr)	HEATING VALUE (BTU/lb or BTU/gal)	SULFUR (%)	NITROGEN (%)
coke/coal	varies			

COMBUSTION EMISSION UNIT (FORM 900-C2)

DISTRICT: <p style="text-align: center; font-size: 1.2em;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-size: 1.1em;">Spreckels Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; font-size: 1.1em;">Spreckels Sugar Company Inc.</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions	TSP	SOx	NOx		
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³	<250 lbs/day	<250lbs/day	,250lbs/day		
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement.					

GENERAL EMISSION UNIT (FORM 900-F1)

DISTRICT: <p style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>

I. PERMIT NUMBER: V-1697A

II. EQUIPMENT DESCRIPTION

1. General process description Sulfur Stove
2. Equipment description: Sulfur burning stoves with eduction systems
3. Equipment make, model & serial number: Custom Made
4. Maximum design process rate or throughput: 4000 lbs sulfur/day total for both
5. Control device(s) type and description (if any): Eduction system
6. Description of coating/solvent application/drying method(s) employed including coating transfer: _____

OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 3300 (hours/year)
2. Exhaust gas flow rate: _____ SCFM @ _____ %H₂O
3. Raw products used and finished products produced:

RAW PRODUCT USED (name)	CONSUMPTION (lbs/hr, gal/hr, etc.)	PRODUCTS PRODUCED (name)	PRODUCTION (lbs/hr, gal/hr, etc.)
sulfur			

GENERAL EMISSION UNIT (FORM 900-F2)

DISTRICT: <p style="text-align: center; font-size: 1.2em;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-size: 1.2em;">Spreckels Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; font-size: 1.2em;">Spreckels Sugar Company Inc.</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions	SOx	PM10			
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³	0.2% vol.	12 lbs/hr			

OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					

¹ For permit modifications only; emissions prior to project modification.
² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.).
³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement.]

GENERAL EMISSION UNIT (FORM 900-F1)

DISTRICT: <p style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>

I. PERMIT NUMBER: V-1697A

II. EQUIPMENT DESCRIPTION

1. General process description Sugar Storage
2. Equipment description: Silos-vertical concrete silos for storing sugar and conveyors
3. Equipment make, model & serial number: N/A
4. Maximum design process rate or throughput: 1500 tons/day produced
5. Control device(s) type and description (if any): baghouse
6. Description of coating/solvent application/drying method(s) employed including coating transfer: N/A

OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 8760 (hours/year)
2. Exhaust gas flow rate: _____ SCFM @ _____ %H₂O
3. Raw products used and finished products produced:

RAW PRODUCT USED (name)	CONSUMPTION (lbs/hr, gal/hr, etc.)	PRODUCTS PRODUCED (name)	PRODUCTION (lbs/hr, gal/hr, etc.)
sugar		Sugar	

GENERAL EMISSION UNIT (FORM 900-F2)

DISTRICT: <p style="text-align: center; color: blue; font-weight: normal;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue; font-weight: normal;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue; font-weight: normal;">Spreckels Sugar</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
<small> ¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement. </small>					

GENERAL EMISSION UNIT (FORM 900-F1)

DISTRICT: <p style="text-align: center; color: blue; font-weight: bold;">IMPERIAL COUNTY</p>	▶ DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar</p>

I. PERMIT NUMBER: V-1697A

II. EQUIPMENT DESCRIPTION

1. General process description Warehouse and Sugar Packing
2. Equipment description: Conveyors and sugar packing for material handling
3. Equipment make, model & serial number: NA
4. Maximum design process rate or throughput: 1500 tons/day produced
5. Control device(s) type and description (if any): baghouse
6. Description of coating/solvent application/drying method(s) employed including coating transfer: NA

III. OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 8760 (hours/year)
2. Exhaust gas flow rate: _____ SCFM @ _____ %H₂O
3. Raw products used and finished products produced:

RAW PRODUCT USED (name)	CONSUMPTION (lbs/hr, gal/hr, etc.)	PRODUCTS PRODUCED (name)	PRODUCTION (lbs/hr, gal/hr, etc.)
sugar		sugar	

GENERAL EMISSION UNIT (FORM 900-F2)

DISTRICT: <p style="text-align: center; color: blue; font-weight: normal;">IMPERIAL COUNTY</p>	▷ DISTRICT USE ONLY ◁ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue; font-weight: normal;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue; font-weight: normal;">Spreckels Sugar</p>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.] required by any applicable federal requirement.					

EMISSION CONTROL UNIT (FORM 900-G1)

DISTRICT: <p style="text-align: center; color: blue; font-weight: bold;">IMPERIAL COUNTY</p>	▶ DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue; font-weight: bold;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue; font-weight: bold;">Spreckels Sugar</p>

I. PERMIT NUMBER: V-1697A

II. EQUIPMENT DESCRIPTION

1. General process description Sugar Conveying and packing
2. Equipment type: Baghouse
3. Equipment description: filter baghouse
4. Equipment make, model & serial number: Sly model 16DS8 Jet pulse
5. Emission unit(s) served by this equipment: conveyors, pulls, packers
6. Maximum design or rated capacity: 1500 tons/day packed

III. OPERATIONAL INFORMATION

1. Exhaust gas: Temperature: _____ (F) Flow Rate: _____ (SCFM)
 Moisture: _____ (%) Oxygen: _____ (%)
 CO₂: _____ (%)
2. General: Manufacturer: _____ Pressure Drop: _____ (in-Hg)
 Inlet Temp.: _____ (F) Outlet Temp.: _____ (F)
3. Catalyst data: Catalyst Type/Material: _____
 Catalyst Life: _____ (years) Volume: _____ (Ft³)
 Space Velocity: _____ (Ft³/Ft) NH₃ inj. Rate: _____ (gal/hr)
 NH₃ Inj. Temp.: _____ (F)
4. Baghouse data: Design: Positive Pressure Negative Pressure
 Cleaning Method: jet pulse
 Fabric Material: cloth
 Flow Rate: 12788 (SCFM) Air/Cloth Ratio: _____
5. ESP data: Number of fields: _____ Cleaning Method: _____
 Power Input: _____
6. Scrubber data: Type/design: _____ Sorbent Type: _____
7. Other Control Devices (include appropriate design information):

GENERAL EMISSION UNIT

(FORM 900-F1)

DISTRICT: <p style="text-align: center; color: blue; font-weight: bold;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar</p>

I. PERMIT NUMBER: V-1697A

II. EQUIPMENT DESCRIPTION

1. General process description Bulk material storage
2. Equipment description: Silo-gypsum storage silo with pneumatic loading and bin vent
3. Equipment make, model & serial number: NA
4. Maximum design process rate or throughput: _____
5. Control device(s) type and description (if any): vent sack filter
6. Description of coating/solvent application/drying method(s) employed including coating transfer: NA

III. OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 8760 (hours/year)
2. Exhaust gas flow rate: _____ SCFM @ _____ %H₂O
3. Raw products used and finished products produced:

RAW PRODUCT USED (name)	CONSUMPTION (lbs/hr, gal/hr, etc.)	PRODUCTS PRODUCED (name)	PRODUCTION (lbs/hr, gal/hr, etc.)
gypsum			

GENERAL EMISSION UNIT (FORM 900-F2)

DISTRICT: <div style="text-align: center; font-size: 1.2em; color: blue;">IMPERIAL COUNTY</div>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <div style="text-align: center; color: blue;">Spreckels Sugar Company, Inc.</div>	FACILITY NAME: <div style="text-align: center; color: blue;">Spreckels Sugar</div>

4. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions ¹					
C. Emission Change ²					
D. Emission Limit ³					
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions ¹					
C. Emission Change ²					
D. Emission Limit ³					
¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.) ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement.					

ORGANIC LIQUID STORAGE UNIT (FORM 900-E1)

DISTRICT: <p style="text-align: center; color: blue; font-weight: bold;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar</p>

I. PERMIT NUMBER: V-1697A

II. EQUIPMENT DESCRIPTION

1. Equipment type: Gasoline Storage Tank
2. Equipment description: 6000 gallon above ground gasoline storage tank
3. Equipment make, model & serial number: _____
4. Maximum design process rate or throughput: _____

III. OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 8760 (hours/year)
2. Raw material used or processed: _____

ORGANIC LIQUID	VAPOR PRESSURE (psia)	BOILING POINT (F)	STORAGE TEMPERATURE (F)	LIQUID THROUGHPUT (gals/year)
gasoline				max 40,000 gal/year
				<10,000 gal/month

3. Total annual throughput: 40,000 (1000 gallons)
4. Profile of material throughput: 20 Jan-Mar (% of total) 30 April-June (% of total)
30 July-Sep (% of total) 20 Oct-Dec (% of total)

IV. TANK DESIGN AND SPECIFICATIONS

1. Tank design:

<input type="checkbox"/> Floating Roof (external)	<input type="checkbox"/> Floating Roof (internal)
<input type="checkbox"/> Fixed Roof	<input type="checkbox"/> Underground
<input type="checkbox"/> Pressure	<input checked="" type="checkbox"/> Other: <u>Horizontal, cylindrical aboveground tank</u>
2. Tank specifications:

Max Fill Rate: _____ (gals/hr)	Max Withdrawal: _____ (gal/hr)
Height: <u>L= 17</u> (ft)	Vapor Space: _____ (ft)
Diameter: <u>8</u> (ft)	Paint color: _____
Capacity: <u>6000</u> (gal)	
3. Shell type:

<input type="checkbox"/> Guniting	<input type="checkbox"/> Riveted	<input checked="" type="checkbox"/> Welded	<input type="checkbox"/> Other: _____
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COATING / SOLVENT EMISSION UNIT (FORM 900-D2)

DISTRICT: <p style="text-align: center;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME:	FACILITY NAME:

3. Unit emissions:

CRITERIA POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
OTHER REGULATED AIR POLLUTANT EMISSIONS (tons per year)					
POLLUTANTS					
A. Emissions					
B. Pre-Modification Emissions¹					
C. Emission Change²					
D. Emission Limit³					
¹ For permit modifications only; emissions prior to project modification. ² Difference between Pre-Modification Emissions (Section B.) and Emissions (Section A.). ³ For voluntary emissions cap and emission limits [i.e. expressed as parts per million (ppm) corrected for dilution air, pounds per hour (lbs/hr), pounds per million BTU (lb/MMBTU, etc.) required by any applicable federal requirement.					

GENERAL EMISSION UNIT (FORM 900-F1)

DISTRICT: <p style="text-align: center; color: blue;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue;">Spreckels Sugar</p>

I. PERMIT NUMBER: V-1697A

II. EQUIPMENT DESCRIPTION

1. General process description Unconfined portable sandblaster for abrasive cleaning
2. Equipment description: sandblaster
3. Equipment make, model & serial number: Pioneer MFG Blasting Gun, 1.4 cu ft POT, 75 HP
4. Maximum design process rate or throughput: _____
5. Control device(s) type and description (if any): none
6. Description of coating/solvent application/drying method(s) employed including coating transfer: NA

III. OPERATIONAL INFORMATION

1. Operating schedule: 24 (hours/day) 8760 (hours/year)
2. Exhaust gas flow rate: _____ SCFM @ _____ %H₂O
3. Raw products used and finished products produced:

RAW PRODUCT USED (name)	CONSUMPTION (lbs/hr, gal/hr, etc.)	PRODUCTS PRODUCED (name)	PRODUCTION (lbs/hr, gal/hr, etc.)
certified abrasive media			

EMISSION CONTROL UNIT (FORM 900-G1)

DISTRICT: <p style="text-align: center; font-weight: bold; font-size: 1.2em;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID: _____
COMPANY NAME: _____	FACILITY NAME: _____

I. PERMIT NUMBER: V-1687A

II. EQUIPMENT DESCRIPTION

1. General process description Thermal Oxidizer
2. Equipment type: Direct Fired Catalytic Oxidizer System
3. Equipment description: Honeywell Eclipse TherJet Burner
4. Equipment make, model & serial number: _____
5. Emission unit(s) served by this equipment: Incinerate exhaust from lime kiln
6. Maximum design or rated capacity: _____

OPERATIONAL INFORMATION

1. Exhaust gas: Temperature: _____ (F) Flow Rate: _____ (SCFM)
 Moisture: _____ (%) Oxygen: _____ (%)
 CO₂: _____ (%)
2. General: Manufacturer: _____ Pressure Drop: _____ (in-Hg)
 Inlet Temp.: _____ (F) Outlet Temp.: _____ (F)
3. Catalyst data: Catalyst Type/Material: _____
 Catalyst Life: _____ (years) Volume: _____ (Ft³)
 Space Velocity: _____ (Ft³/Ft) NH₃ inj. Rate: _____ (gal/hr)
 NH₃ Inj. Temp.: _____ (F)
4. Baghouse data: Design: Positive Pressure Negative Pressure
 Cleaning Method: _____
 Fabric Material: _____
 Flow Rate: _____ (SCFM) Air/Cloth Ratio: _____
5. ESP data: Number of fields: _____ Cleaning Method: _____
 Power Input: _____
6. Scrubber data: Type/design: _____ Sorbent Type: _____
7. Other Control Devices (include appropriate design information):

COMPLIANCE PLAN (FORM 900-I2)

DISTRICT: <p style="text-align: center;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME:	FACILITY NAME:

III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form XXX-I1;*
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form XXX-I1, on a timely basis¹ ;*
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form XXX-I1, and I have attached a compliance plan schedule.²*



Signature of Responsible Official

07/09/2020

Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

COMPLIANCE PLAN CERTIFICATION (FORM 900-J1)

DISTRICT: <p style="text-align: center; margin: 0;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; margin: 0;">Spreckels Sugar Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; margin: 0;">Spreckels Sugar Company Inc.</p>

I. CERTIFICATION STATUS

1. Indicate the dates the applicant intends to submit the **COMPLIANCE CERTIFICATION REPORT** to the district during the entire permit term. The district federal operating permits rule requires the applicant to submit this report at least annually.

by the end of February for each preceding year

2. For sources required to have a schedule of compliance to remedy a violation, indicate the dates the applicant intends to submit **CERTIFIED PROGRESS REPORTS** to the district during the permit term. The district federal operating permits rule requires the applicant to submit this report at least semiannually.

by the end of February and the end of August

3. Describe the compliance status of the source with respect to applicable enhanced monitoring, and compliance certification requirements of Section 114(a)(3) of the Clean Air Act:

CERTIFICATION STATEMENT (FORM 900-M)

DISTRICT: <p style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</p>	<p style="text-align: center; font-weight: bold;">▶ DISTRICT USE ONLY ◀</p> DISTRICT ID:
COMPANY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>	FACILITY NAME: <p style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company Inc.</p>

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application

- Stationary Source Summary Form
- Total Stationary Source Emission Form
- Compliance Plan Form
- Compliance Plan Certification Form
- Exempt Equipment Form
- Certification Statement Form

List other forms or attachments

Current Title V

Attachments included with application

- Description of Operating Scenarios
- Sample emission calculations
- Fugitive emission estimates
- List of Applicable requirements
- Discussion of units out of units of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
- Facility schematic showing emission points
- NSR Permit
- PSD Permit

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in (title of district Title V permitting rule).

Signature of Responsible Official	07-09-2020 Date
-----------------------------------	-------------------------------------------------------------------------

Greg Martin
 Print Name of Responsible Official

District Manager SMBSC / Spreckels Sugar
 Title of Responsible Official and Company Name

STATIONARY SOURCE SUMMARY

(FORM 900-A1)

DISTRICT: **IMPERIAL COUNTY**

COMPANY NAME: **Spreckels Sugar Company, Inc.**

▶ DISTRICT USE ONLY ◀

District ID: _____

Application #: _____

Application Received: _____

Application Filing Fee: _____

Application Deemed Complete: _____

I. FACILITY IDENTIFICATION

1. Facility Name: **Spreckels Sugar Company, Inc.**
2. Four digit SIC Code: **2063** EPA Plant ID: **CAD 008494460**
3. Parent Company (if different than Facility Name): **Southern Minnesota Beet Sugar Cooperative**
4. Mailing Address: **P.O. Box 581**
5. Street Address or Source Location: **395 West Keystone Road, Brawley, CA 92227**
6. UTM Coordinates (if required):
7. Source located within: 50 miles of the state line Yes No
50 miles of a Native American Nation Not Applicable Yes No
8. Type of Organization: Corporation Sole Ownership Government Partnership Utility Company
9. Legal Owner's Name: **Southern Minnesota Beet Sugar Cooperative**
10. Owner's Agent Name (if any):
11. Responsible Official: **Shelby Dnye**
12. Plant Site Manager/Contact: **Shelby Dnye** Telephone #: **7603443110**
13. Type of facility: **Sugar Beet Processing Plant**
14. General description of processes/products: **manufacture granulated sugar from sugar beets**
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see attachment A)? Yes No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? Not Applicable Yes No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

COMPLIANCE PLAN (FORM 900-I2)

DISTRICT: <div style="text-align: center; font-weight: bold; color: blue;">IMPERIAL COUNTY</div>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <div style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar Company, Inc.</div>	FACILITY NAME: <div style="text-align: center; font-weight: bold; color: blue;">Spreckels Sugar</div>

III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form XXX-11;*
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form XXX-11, on a timely basis¹ ;*
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form XXX-11, and I have attached a compliance plan schedule.²*

Steven Olson
Signature of Responsible Official

7/24/23
Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

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CERTIFICATION STATEMENT (FORM 900-M)

DISTRICT: <p style="text-align: center; color: blue; font-weight: bold;">IMPERIAL COUNTY</p>	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: <p style="text-align: center; color: blue; font-weight: bold;">Spreckels Sugar Company, Inc.</p>	FACILITY NAME: <p style="text-align: center; color: blue; font-weight: bold;">Spreckels Sugar</p>

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Forms included with application

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- Total Stationary Source Emission Form
- Compliance Plan Form
- Compliance Plan Certification Form
- Exempt Equipment Form
- Certification Statement Form

List other forms or attachments

900-A1 _____

900-I2 _____

900-K2 _____

900-M _____

Attachments included with application

- Description of Operating Scenarios
- Sample emission calculations
- Fugitive emission estimates
- List of Applicable requirements
- Discussion of units out of units of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
- Facility schematic showing emission points
- NSR Permit
- PSD Permit

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in (title of district Title V permitting rule).

Steven Olson _____ 7/24/23 _____
 Signature of Responsible Official Date

Steve Olson _____
 Print Name of Responsible Official

Regional Manager _____
 Title of Responsible Official and Company Name