

Permit No.: V-1697
August 2, 2023

IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

150 S. Ninth Street
El Centro, CA 92243
(442) 265 1800

MAJOR FACILITY TITLE V PERMIT REVIEW

Issued in Accordance with the Provisions of 40 CFR Part 70
and Rule 900 of the Imperial County Air Pollution Control District

Facility Name:	Spreckels Sugar Company, Inc
Parent Company Name:	Southern Minnesota Beet Sugar Cooperative
SIC Code:	2063 (Sugar Beet Processing Plant)
EPA Plant ID:	CAD 008494460
General Description of Process:	Sugar Production from Sugar Beets
Plant Location:	395 W. Keystone Road, Brawley, California
Mailing Address:	P.O. Box 581, Brawley, CA 92227
Responsible Official:	Steven Olson
Plant Site Contact:	Steven Olson (760) 344-3110
Permit Reviewer:	Jesus Ramirez (APC Division Manager)

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I. Introduction

Pursuant to Rule 900, of the Imperial County Air Pollution Control District Rules and Regulations, the District intends to issue a renewal Title V Operating Permit to Spreckels Sugar Company, Brawley factory. Spreckels Sugar Company is a subsidiary of Southern Minnesota Beet Sugar Cooperative. Spreckels Sugar Company is a sugar beet processing plant. This renewal includes the conversion of Spreckels Sugar's Riley Boiler from coal fired capability to natural gas fired capability. The facility operates under Title V Operating Permit number V-1697. The Operating Permit includes conditions to ensure compliance with Federal, State and Local requirements.

II. Project Description

Spreckels Sugar Company was constructed in 1947. The facility processes field-run sugar beets for the manufacturing of sugar. The process is still the same since the plant started, is an old fashion process where raw materials are produced in-situ, including electric power co-generation making the plant more efficient and feasible.

The process starts when sugar beets are first unloaded at a sugar beet receiving station. The beets are washed and sliced. The sliced (shoe string) beets are introduced into a diffuser, thus producing a sugar juice. The beet pulp is further pressed for extracting the remaining sugar juice. After pressing, the pulp with 75% moisture is hauled out to the sun-drying area. Sun drying of beet pulp is on a 108-acre black-top surface area. The pulp is spread out and periodically turned to promote drying and wind rowed for loading and storage.

Limestone rock is calcined in two coke-fired kilns producing carbon dioxide and calcium oxide. The calcium oxide is slaked to produce calcium-hydroxide. The carbon dioxide and the slaked lime are two major compounds used in the sugar clarification process. The slaked lime and compressed CO₂ are absorbed into the first and second stage carbonation tanks, when the re-carbonation of the lime take place, a flocculation of the impurities occur starting the clarification process of the juice. Therefore, the juice is transfer to settling tanks (second stage) passing through the secondary filters. The impurities co-precipitate settling out with calcium carbonate that is pumped to the PCC evaporation pond to be stored. Sulfur is burned in two sulfur stoves to produce sulfur dioxide which is introduced into the sulfur tower and is inducted in-line (venturi wise) into the juice for color removal (bleaching) and reduce alkalinity. The juice is further evaporated and thickened to super saturation to form crystals. The thickened juice or syrup is centrifuged into sugar crystals, in a three-stage process. The sugar crystals are then dried and stored into silos. Storage tanks are available to store surplus syrup

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production allowing sugar production to continue after sugar beet harvesting terminates in late July. Molasses, a by-product of syrup production, is the low end after of the centrifuge process. Molasses, as well as the beet pulp is used as by product for cattle feed-supplement.

The facility operates a Riley boiler to furnish steam needed for power co-generation, and other turbine drives. The steam exhausting from these turbines furnishes the heat needed in the manufacturing of sugar. Additionally, the facility operates a Union Boiler, a C.E. boiler and an Auxiliary Boiler. The Riley boiler and the remaining boilers are fired with natural gas. The facility operates approximately 135 days per year for sugar beet processing (April thru July).

III. Current Emission Status:

Spreckels Sugar Company, Inc. has submitted a Title V renewal application for its sugar beet processing plant in Brawley, California. This facility has been determined as a major source of emissions for Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), and Carbon Monoxide (CO).

IV. Applicable Requirement

According to the information submitted in the Title V application and the District review, the following are the Federal, State, and District requirements that apply to the facilities.

Applicable Requirement	Equipment Affected	Adoption Date
Rule 109- Source Sampling	Boilers	09/14/99
Rule 110- Stack Monitoring	Riley Boiler	09/14/99
Rule 201-Permits Required	Facility Wide	10/10/06
Rule 202-Exemptions	Facility Wide	10/10/06
Rule 207- New and Modified Stationary Source	Facility Wide	09/11/18
Rule 208- Permit to Operate	Facility Wide	09/14/99
Rule 400.2-Boilers, Process Heaters and Steam Generators	Boilers	02/23/10
Rule 401-Opacity of Emissions	Facility Wide	11/19/85
Rule 403-General Limitations on the Discharge	Boilers and	05/18/04

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of Air Contaminants	Sandblaster	
Rule 405-Sulfur Compounds Emission Standards, Limitations and Prohibitions	Boilers, sulfur stoves and Unconfined Sandblaster	05/18/04
Rule 407-Nuisance	Facility Wide	09/14/99
Rule 415- Transfer and Storage of Gasoline		10/03/20
40 CFR Part 60, Subpart Db- Standards of Performance for Industrial-Commercial-Institutional Steam Generating Unit.	Riley Boiler	Not Applicable
NSR Permit 1697C-2	Riley Boiler	
NSR Permit 1631A	Lime Kilns	
NSR Permit 1112A	CE Boiler	
NSR Permit # 1113A	Union Boiler	
NSR Permit 2274A	Auxiliary Boiler	
NSR Permit #2687A	Aboveground Gasoline Storage Tank	
NSR Permit 2273A	Manufacturing	
NSR Permit #3048	Sandblaster	
40 CFR Part 82, Stratospheric Ozone Protection	Air Conditioning Equipment	
Rule 900-Operating Permits	Facility Wide	12/20/11

V. Statements of Basis

The proposed Operating Permit includes conditions to ensure that all Federal requirements are satisfied. Additionally, the permit has been designed to have adequate monitoring, record keeping and reporting requirements to demonstrate continuous compliance with the permit conditions.

The following provides additional clarification regarding certain permit changes and permit conditions.

1. Riley Boiler Permitting History

Holly Sugar was constructed in 1947 to manufacture sugar from sugar beets. The

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Riley boiler was installed at that time to furnish steam needed to drive a turbo-generator and other turbine drives. The original ATC permit # 1113 was issued for the Riley boiler on February 1, 1977. The boiler was installed with the capability of using No. 6 fuel oil and as alternative natural gas. The source requested an amendment to the ATC permit for the conversion of the existing 180 MMBtu/hr oil and gas-fired into a coal burning unit. The ATC permit #1697 was issued for a 194.5 MMBtu/hr coal boiler on March 28, 1985. On January 5, 1988, the facility requested an amendment to the ATC permit. An agreement was made with the source to exchange an increase of the emission limit of particulate matter for a reduction of the emission limits for sulfur dioxide and nitrogen oxides. The ATC numbering was added with a letter that represents the new amendment done in the permit. The ATC permit was amended again to change the requirement of a yearly source test of the Riley boiler to a source-test upon request by the APCD.

The numbering of the ATC changed to 1697B. The last amendment was done on August 22, 2005. The Permittee requested a change of condition 1.B which limited the operation time of the Riley boiler to 135 days per year. The permittee requested to change the operation time based in the coal usage of the Riley boiler during production season, instead of days of operation per year. The ATC permit numbering changed to 1697C.

The permittee requested to amend Permit to Operate # 1697C to allow the conversion of Spreckels Sugar's Riley Boiler from coal fired capability to natural gas fired capability. The facility proposed to modify their existing Riley Boiler in order to reduce potential emissions and to generate Emission Reduction Credits. The ATC was issued on August 8, 2012. The ATC Permit number was change to 1697C-2.

In 2022, the permittee submitted an application to the Air District requesting a change to permit condition No. B.1. Permit condition B.1 limits the Riley boiler's daily, quarterly and yearly natural gas usage. Spreckels requested to remove the quarterly natural gas usage limit from the permit condition on the basis that there is no regulation that requires a quarterly limit, instead a daily and yearly limit was maintained. The ATC Permit #1697C-2 was amended following the District's NSR procedures. The ATC was issued on March 23, 2022. The ATC Permit number was changed to 1697C-3. The Amended Authority to Construct/Permit to Operate #1697C-3 became federally enforceable. ATC permit 1697C-3 will be incorporated into the Operating Permit as federally enforceable.

Permit to Operate 1697-C, Condition F, referencing permit predecessor is not applicable since it refers to an outdated requirement. This requirement does not

come from any Federal, State or SIP District regulation. This condition will not be included in the Title V Operating Permit.

2. 40 CFR 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.

40 CFR Part 60, Subpart Db set limits for the operation of steam generating units which were constructed, modified, or reconstructed after 6/19/84. This regulation effects fossil fueled fired boilers with a maximum rated heat input greater than 100MMBtu/hr. The Riley boiler was installed (constructed) in 1947. On September 6, 2011, the facility submitted an application for the conversion of the existing 194.5 MMBtu/hr coal-fired Riley boiler into a natural gas burning unit. The facility changed the fuel of the Riley Boiler in order to reduce potential emissions and generate Emission Reduction Credits. The project did not meet the definition of Modification. Modifications, as described in 40CFR60.1, means any physical change in, or change in the method of operation of, and existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any other pollutant (to which a standard applies) into the atmosphere not previously emitted.

Subpart Db sets standards effecting NO_x, SO_x, and PM emissions. The proposed project will result in no net increase of NO_x, SO_x, and PM emissions.

In addition, EPA NSPS regulations also trigger applicability for any “reconstruction”, which is defined in § 60.15 as a project where “the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility”. The preamble to the NSPS Reconstruction definition further defines the fixed capital costs as “... costs of engineering, purchase, and installation of major process equipment, contactors’ fees, instrumentation, auxiliary facilities, building, and structures.” Below is the estimated fixed capital cost for construction of a comparable natural gas fired boiler.

Description	Amount	EPA Equation5
Purchased Equipment Cost	1,845,750	A
Sales Tax and Freight	147,660	0.08 x A
Direct Installation Costs	553,725	0.3 x A
Indirect Installation Costs	572,183	0.31 x A
Total Capital Cost =	3,119,318	

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The total capital cost for the burner replacement project, based on vendor quotes is \$1,043,000.

$$\frac{\text{Fixed capital cost of new components}}{\text{Fixed capital cost for construction of new facility}} = \frac{1,043,000}{3,119,317} = 0.33$$

This analysis clearly shows that the conversion to natural gas for the Riley boiler is not considered a reconstruction as defined in 40 CFR 60, as the cost of reconstruction is only 33% of the cost of a comparable facility. As a result, the Riley boiler is not required to comply with the requirements of 40 CFR 60, Subpart Db.

3. In accordance with SIP Rule 400.2, Boilers, Process Heaters and Steam Generators, the Riley Boiler is required to comply with a NO_x limit of 30 ppmv (3% O₂, dry basis) or 0.036 lb/MMBTU of heat input when operated on natural gas.

The requirements of SIP Rule 400.2 for NO_x will be subsumed under the NSR Permit to Operate #1697C-3, Condition B.2 requirements. The NO_x emission limits for the Riley boiler were set based on an emission level of 0.036 lb/MMBTU (0.036 lb/MMBTU x 194.5 MMBTU/hr = 7 lb/hr). This value is equal to the limits on SIP Rule 400.2. This is an appropriate action, due to the fact that the NSR permit requirement for nitrogen oxides is as stringent as the requirements of SIP Rule 400.2. All of these requirements are currently federally enforceable; therefore, by streamlining these conditions we are not creating new federally enforceable requirements.

4. In accordance with SIP Rule 403, General Limitations on the Discharge of Contaminants, the Riley Boiler is required to comply with a Particulate Matter limit as defined in this rule.

Rule 403 applies to the discharge of air contaminants, combustion contaminants, and particulate matter into the atmosphere. Rule 403, table 403-2 defines the maximum concentration of contaminants (grains/scf) dependent upon the dry gas emission rates (scf/min). The natural gas fired boiler is limited to a heat input of 194.5 MMBtu. Multiplying the F factor (volumes of combustion components per unit of heat content) for natural gas (8710 dscf/MMBtu) by the heat input limitation of the unit gives a dry gas emission rate of 1.69x10⁶ scf/hr (2.8x10⁴ scf/min). According to table 403-2, for gas volume discharge rates of 2.8x10⁴ scf/min, the maximum allowable concentration of contaminants from the boiler's exhaust is approximately 0.0537 grains/scf. This amounts to 13 lbs/hr. The Particulate

Matter limit of SIP Rule 403 will be subsumed under the requirements of NSR Permit to Operate # 1697C-3, Condition B.2. Compliance with these limits is assumed due to the worst case limits contained in the NSR Permit of 1.45 lbs/hr of Particulate Matter (PM10 and PM2.5). This is an appropriate action, due to the fact that the NSR permit requirements for Particulate Matter emissions are more stringent than the requirements of SIP Rule 403. All of these requirements are currently federally enforceable; therefore, by streamlining these conditions, we are not creating new federally enforceable requirements.

5. In accordance with SIP Rule 405, Sulfur Compounds Emissions Standards, Limitations and Prohibitions, the Riley Boiler is required to comply with a sulfur dioxide limit of 2000 ppm and 200 lb/hr. Also, the sulfur compounds in gaseous fuels are limited to 50 grains/100 ft³, calculated as hydrogen sulfide.

The SO₂ limits of SIP Rule 405 will be subsumed under the NSR permit requirements. The SO₂ limit of SIP Rule 405 would be 2000 ppmv and 200 lb/hr. Compliance with these limits is assumed for Riley boiler due to the worst case limit contained in the NSR Permit to Operate #1697C-3, Condition B.2, of 0.11 lb/hr of SO₂ when the boiler is fueled on natural gas. The SO₂ concentration at the permitted emission level would be 42 ppmv $[(0.11 \text{ lb SO}_2/\text{hr}) * ((\text{lb moles air}) / (64.1 \text{ lb-mol SO}_2)) * ((379 \text{ SCF air}) / (\text{lb-mol air})) * (\text{hr} / 1.69 \times 10^6 \text{ SCF}) = 0.42 \text{ ppm}]$. Also, NSR Permit to Operate #1697C-3, Condition B.3, restricts burning of gaseous fuels containing sulfur compounds in excess of 50 grains/100 ft³. This limit is the same contained in Rule 405.

This is an appropriate action, due to the fact that the NSR permit requirements for sulfur dioxide are more, or as, stringent than the requirements of SIP Rule 405. These requirements are currently federally enforceable; therefore, by streamlining these conditions, we are not creating new federally enforceable requirements.

6. Riley Boiler-Compliance Determination

Compliance of the Riley boiler with the applicable requirements will be determined by conducting an annual performance test for nitrogen oxides. Compliance with PM and PM10 requirements will be determined by conducting a compliance performance test every three years. The table below shows the boiler's monitoring requirements to demonstrate compliance with the applicable requirements:

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Criteria Pollutant	Applicable Requirement	Limit / Standard	Monitoring Requirement	
			Method	Reporting Units
NO _x	ATC 1697C-3, Cond B.2	30 ppm @ 3% O ₂ and 7 lb/hr	CARB-100, EPA 7, 7A, 7C and 7E	PPM and lb/hr
PM/PM ₁₀	ATC 1697C-3, Cond B.2	7.6 lb/MMSCF and 1.45 lb/hr	EPA 201A and 202	lb/hr
TSP/PM ₁₀	SIP Rule 403	0.2 gr/SCF	EPA 201A and 202	gr/SCF
TSP/PM ₁₀	SIP Rule 403	0.2 gr/SCF @ 12 % CO ₂ /O ₂	EPA 201A and 202	gr/SCF @ 12 % CO ₂
SO _x	ATC 1697C-3, Cond B.2	0.11 lb/hr	Public Utility Natural Gas	lb/hr
SO ₂	SIP Rule 405	Sulfur 0.2 % by vol.	Public Utility Natural Gas	ppmv

7. CE Boiler Permitting History

The CE boiler operated under Permit to Operate #1112. On July 7, 2010 the permittee submitted an application to amend the Authority to Construct (ATC) to retrofit the CE Boiler with Flue Gas Recirculation (FGR) to meet 30ppm or 0.036 lb/MMbtu NO_x emission limit imposed by the District's Rule 400.2, Boilers, Process Heaters and Steam Generators. Per applicant's request, this amendment did not include usage of a secondary fuel. The ATC/PTO was issued on February 27, 2013. The ATC Permit #1112 was amended following the District's NSR procedures. The ATC Permit number was change to 1112A. The Amended ATC/PTO #1112A became federally enforceable; therefore, the Permit to Operate conditions are incorporated into the Title V Operating Permit.

8. Union Boiler Permitting History

The Union Boiler operated under Permit to Operate #1113. On July 7, 2010 the permittee submitted an application to amend the Authority to Construct (ATC) to retrofit the Union Boiler with Flue Gas Recirculation (FGR) to meet 30ppm or 0.036 lb/MMbtu NO_x emission limit imposed by the District's Rule 400.2, Boilers, Process

Heaters and Steam Generators. Per applicant's request, this amendment did not include usage of a secondary fuel. The ATC/PTO was issued on February 27, 2013. The ATC Permit #1113 was amended following the District's NSR procedures. The ATC Permit number was change to 1113A. The Amended ATC/PTO #1113A became federally enforceable; therefore, the Permit to Operate conditions are incorporated into the Title V Operating Permit.

9. Auxiliary Boiler Permitting History

The Auxiliary Boiler operated under Permit to Operate #2274. On July 7, 2010 the permittee submitted an application to amend the Authority to Construct (ATC) to retrofit the Union Boiler with Flue Gas Recirculation (FGR) to meet 30ppm or 0.036 lb/MMbtu NO_x emission limit imposed by the District's Rule 400.2, Boilers, Process Heaters and Steam Generators. The ATC/PTO was issued on February 27, 2013. The ATC Permit #2274 was amended following the District's NSR procedures. The ATC Permit number was change to 2274A. The Amended ATC/PTO #2274A became federally enforceable; therefore, the Permit to Operate conditions are incorporated into the Title V Operating Permit.

10. In accordance with SIP Rule 400.2, Boilers, Process Heaters and Steam Generators, the CE boiler, the Union boiler and the Auxiliary boiler are required to comply with a NO_x limit of 30 ppmv (3% O₂, dry basis) or 0.036 lb/MMBTU of heat input when operated on natural gas.

The requirements of SIP Rule 400.2 for NO_x will be subsumed under the NSR Permit to Operate #1112A, Condition 7, requirements for the CE boiler. The NO_x emission limit for the CE boiler was set based on an emission level of 0.036 lb/MMBTU (0.036 lb/MMBTUx 202 MMBTU/hr = 7.272 lb/hr). This value is equal to the limits on SIP Rule 400.2. Also, the requirements of SIP Rule 400.2 for NO_x will be subsumed under the NSR Permit to Operate #1113A, Condition 7, requirements for the Union boiler. The NO_x emission limit for the Union boiler was set based on an emission level of 0.036 lb/MMBTU (0.036 lb/MMBTUx 90 MMBTU/hr = 3.24 lb/hr). This value is equal to the limits on SIP Rule 400.2. Lastly, The requirements of SIP Rule 400.2 for NO_x will be subsumed under the NSR Permit to Operate #2274A, Condition 7, requirements for the Auxiliary boiler. The NO_x emission limit for the Auxiliary boiler was set based on an emission level of 0.036 lb/MMBTU (0.036 lb/MMBTUx 88.5 MMBTU/hr = 3.186 lb/hr). This value is equal to the limits on SIP Rule 400.2. This is an appropriate action, due to the fact that the NSR permit requirement for nitrogen oxides for each Permit to Operate are as stringent as the requirements of SIP Rule 400.2. All of these requirements are currently federally enforceable; therefore, by streamlining these conditions we

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are not creating new federally enforceable requirements.

11. Lime Kilns Permit

In 2020, Spreckels Sugar Co. submitted an application for an Authority to Construct and Permit to Operate for the modification of permit# 1631A, which corresponds to the dust collection system that controls fugitive dust from the lime kilns at the facility. The purpose of the modification was to install a thermal oxidizer for the lime kilns exhaust in order to decrease opacity levels. The ATC/PTO was issued on April 6, 2020. The ATC Permit #1631A was amended following the District's NSR procedures. The ATC Permit number was change to 1631A-1. The Amended ATC/PTO #631A-1 became federally enforceable; therefore, the Permit to Operate conditions are incorporated into the Title V Operating Permit.

Permit to Operate 1631A-1, Condition C.3, referencing breakdown conditions and emergency variance procedures is not applicable since it refers to an outdated requirement. This requirement does not come from any Federal or SIP District regulation. This condition will be not included in the Title V Operating Permit.

12. CE, Union and Auxiliary Boilers-Compliance Determination

Compliance with the nitrogen oxides requirements will be determined by conducting a performance test every year. The table below shows the boiler's monitoring requirements to demonstrate compliance with the applicable requirements:

Pollutant	Applicable Requirement	Monitoring Requirement	
		Method	Reporting Units
NO _x	NSR Permits	USEPA 7, 7A, 7C, 7E	ppm @ 3% O ₂ dry, lb/hr
TSP (PM10)	NSR Permits	USEPA 5	lb/hr
TSP (PM10)	SIP Rule 403	USEPA 5	gr/SCF and gr/SCF @ 12 % CO ₂

13. Riley, CE, Union and Auxiliary Boiler - Compliance with requirements of 40 CFR Part 64, Compliance Assurance Monitoring. This regulation applies to units which have emissions of any regulated pollutant "equal to or greater than 100 percent of

the amount, in tons per year, required for a source to be classified as a major source". The unit that has the highest potential to emit of any of the regulated pollutants is the CE Boiler, which has a CO emission of 72.5 tons per year. Since all the units have a potential to emit of any regulated pollutant less than 100 tons per year the units are exempted from 40 CFR Part 64, Compliance Assurance Monitoring.

14. Insignificant Emission Units

The Permittee operates several emission units and activities that are not included in the Title V Operating Permit due to air emissions from these units or activities are considered insignificant. These emissions units and activities are still required to comply with all federal requirements, as applicable. The Title V exclusion was granted following the guidance of CAPCOA model List of Insignificant Activities for Title V Permit Program, date June 28, 2000. These emission units exempted and bases for exemption are listed in the Insignificant Activities section.

VI. Insignificant Activities

The following types of activities and emission units will be included in the Title V permit:

1. Motor vehicles and plant mobile equipment. Combustion emissions from propulsion of mobile sources will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.
2. Diesel aboveground storage tank 350 gallons capacity. Diesel storage tanks is exempted due to the low volatility of diesel, vapor pressure < 0.1 psia.
3. Diesel aboveground Storage Tank 500 gallons capacity. Diesel storage tanks is exempted due to the low volatility of diesel, vapor pressure < 0.1 psia.
4. Diesel aboveground Storage Tank 1,000 gallons capacity. Diesel storage tanks will be exempted due to the low volatility of diesel, vapor pressure < 0.1 psia.
5. Solvent part cleaners. Unheated non-conveyorized cleaning equipment with a surface area less than 1.0 sq.m., using organic solvents with an initial boiling point of 160EC or greater, and losing less than 25 gal/yr of solvent to the atmosphere. The solvent used at the cleaning station has an initial boiling point of 177EC, the area is smaller than 1 sq.m., and loses are less than 25 gal/yr.

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VII. Supplemental Annual Fee

The supplemental annual fee for the facilities will be determined according to the guidelines of Rule 900.G. The supplemental annual fee will be calculated according to the following equation:

$$s = [\$ 58.55 \text{ per ton (CPI adjusted)} \times e] - f$$

where:

s = supplemental annual fee in dollars

e = fee-based emissions in tons per year

2021 Actual emission inventory for which fee-based emission schedule applies:

Nitrogen Oxides	=	28.00
Particulate Matter (PM-10)	=	22.96
Volatile Organic Compounds	=	21.59
TOTAL	=	72.55

f = sum (in dollars) of annual fees under Regulation III:

Equipment	Permit #	Fee Paid
Riley Boiler	1697C-3	\$ 5,111.50
CE Boiler	1112A	\$ 5,111.50
Union Boiler	1113A	\$ 5,111.50
Lime Kilns	1631A-1	\$ 10,226.00
Auxiliary Boiler	2274A	\$ 5,111.50
Manufacturing	2273A	\$ 1,949.00
Gasoline Storage Tank	2687A-1	\$ 541.50
Portable Sandblaster	3048	\$ 1,022.00
TOTAL		\$ 34,184.50

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Total Emissions of Fee Pollutants:	72.55 tons/yr
Emissions of Fee Pollutants x \$58.55/ton:	\$ 4,247.80
Annual Fees under Reg. III	\$ 34,148.50
Estimated supplemental Title V Program Fee:	\$ 0.00

These calculations indicate that the annual fee paid by the facilities under Regulation III exceeds the emission fee pollutant schedule under Rule 900 therefore no supplemental fee is required.