

Public Hearing on Proposed Renewal of Title V Permit for Mt. Poso CoGeneration Company LLC

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Hearing Agenda

- Commenter cards
- What Is Title V?
- Mt. Poso CoGeneration Company LLC and Title V
- Operations Under Permit
- Renewal Process
- Next Steps
- Public Comments

What is Title V?

- Title V is a federally mandated operating permit program which requires major sources to maintain permits which can be enforced by the District or the Environmental Protection Agency (EPA), or by individual citizens.
- This is in addition to any permits required by the Air District.
- These are combined into one operating permit, with the Title V conditions identified as “Federally Enforceable through Title V”

What is Title V? *cont.*

- Title V permits include appropriate conditions for all Federally applicable rules that apply to the source, including adequate monitoring, recordkeeping and reporting.
- Title V permits are issued for up to a five-year period.
- Renewal application must be submitted 6 to 18 months before the current permit expires.
- Renewal application acts as permit extension.

What is Title V? *cont.*

- Proposed action (approval or denial) noticed in newspaper of general circulation, posted on website, and sent to all who request notice.
- Final action considers all comments received.
- Federal Title V permits assure compliance with applicable air requirements.
- If facility is out of compliance with an applicable air requirement, permit must include a schedule of compliance.

Mt. Poso CoGeneration Company (MPCC) and Title V

- Facility is a Major Source for Oxides of Nitrogen (NO_x), Volatile Organic Compounds (VOC), and Greenhouse Gases (GHG)
- For MPCC, initial Title V Permit issued April 27, 2000 and renewed on October 4, 2005 with expiration date of August 31, 2009.

Operations Under Permit

- 49.9 MW solid fuel cogeneration plant with low temperature staged combustion, ammonia injection, pulverized limestone injection, fly ash baghouse, - permit S-91-3
- Note: MPCC has approval to add biomass as a fuel, but has only recently finished construction of the fuel yard / receiving operation. Biomass fuel will be added to the Title V permit at a later time, once they are fully operational and have demonstrated compliance.

Operations Under Permit *cont.*

- Fuel receiving, handling and storing with dust suppression and baghouse – permits S-91-1 and '9
- Limestone receiving, handling and storage with silo and baghouse – permits S-91-2 and '5
- Ash conveying, handling and storage with bottom and fly ash baghouses – permit S-91-4
- Cooling tower – permit S-91-8
- Diesel-fired emergency firewater pump - permit S-91-12

Title V Renewal Process

- Source submits application
- District reviews permits and prepares evaluation
- Look at new and amended rules since the last Title V permit was issued
- Update permits to ensure they contain all appropriate Federally applicable conditions.
- For MPCC, these rules include regulations for the solid fuel cogeneration plant and diesel-fired emergency firewater pump.

Title V Renewal Process *cont.*

- The proposal to either renew, or deny the renewal of, the permit is sent to the Federal EPA and California Air Resources Board (ARB).
- The proposal is noticed in the newspaper of general circulation in the area, and sent to anyone who requests it, and is posted on the District's website (www.valleyair.org).
- For this renewal, the proposal to renew the permit was sent to EPA and ARB on May 10, 2011, and published in the Bakersfield Californian on May 13, 2011.



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Title V Renewal Process *cont.*

- The applicant, ARB and the public will have 30-days from newspaper publication to submit written comments on the draft permits.
- For MPCC, comment period extended until February 14, 2012, 15 days after this hearing.
- The public may request to have a public hearing, during which verbal comments may be given.
- For MPCC, the Association of Irrigated Residents requested this hearing.



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Title V Renewal Process *cont.*

- The EPA has 45-days to comment on the draft permits.
- The District shall make changes to conditions based on comments received, if appropriate.
- The final permit, if approved, will be sent to the applicant with copies to ARB, EPA, and anyone who commented, as well as posted on the District website.

Next Steps

- Will review all comments received and prepare responses, including changes to conditions, if appropriate.
- Will issue final decision and send to applicant, ARB, EPA, and people who commented, as well as post on website.



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Public Comments



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