



FEB 25 2010

Ed Warner
Northern California Power Agency
PO Box 1478
Lodi, CA 95241

**Re: Notice of Final Action - Title V Permit Renewal
District Facility # N-2697
Project # N-1082034**

Dear Mr. Warner:

The District has issued the Final Renewed Title V Permit for Northern California Power Agency. The preliminary decision for this project was made on August 17, 2009. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

cc: Thom Maslowski, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



FEB 25 2010

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit Renewal
District Facility # N-2697
Project # N-1082034**

Dear Mr. Rios:

The District has issued the Final Renewed Title V Permit for Northern California Power Agency. The preliminary decision for this project was made on August 17, 2009. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

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FEB 25 2010

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit Renewal
District Facility # N-2697
Project # N-1082034**

Dear Mr. Tollstrup:

The District has issued the Final Renewed Title V Permit for Northern California Power Agency. The preliminary decision for this project was made on August 17, 2009. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT
NOTICE OF FINAL DECISION TO ISSUE
RENEWED FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the renewed Federally Mandated Operating Permit to Northern California Power Agency for its electrical power generation facility at 12745 N Thorton Road in Lodi, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1082034, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. For additional information regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Title V Permit Renewal Evaluation
Northern California Power Agency
N-2697

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TITLE V PERMIT RENEWAL EVALUATION

Lodi Plant

Engineer: Thom Maslowski
Date: August 6, 2009

Facility Number: N-2697
Facility Name: Northern California Power Agency
Mailing Address: P O Box 1478
Lodi, CA 95241-1478

Contact Name: Vinnie Venthongkham
Phone: (209)333-6370 ex. 109

Responsible Official: Ed Warner
Title: Plant Manager

Project # : N-1082034
Deemed Complete: 5/28/2008

I. PROPOSAL

Northern California Power Agency was issued a Title V permit on January 13, 2000. 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 initial Title V permit.

NCPA was issued ATC N-2697-1-6 with COC to lower the annual VOC emissions to 19,992 lb-VOC in order to not be subject to Compliance Assurance Monitoring for VOC. This document will use this ATC as the basis for the permit renewal.

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

Northern California Power Agency is located at 12745 North Thorton Road, Lodi, San Joaquin County, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment A.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

A. Template SJV-UM-0-2 Facility Wide Umbrella

The applicant has requested to utilize template No. SJV-UM-0-2, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Renewed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1 through 40 of the requirements for permit unit N-2697-0-3.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 4101, Visible Emissions¹
(amended November 15, 2001⇒ amended February 17, 2005)

Following Rules are amended from previous Non-SIP version to correct SIP deficiencies and are now included in SIP.

- 40 CFR Part 60, Subpart GG, New Source Performance Standards; Standard of Performance for Stationary Gas Turbines
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subparts B and F, Stratospheric Ozone

B. Rules Added

Following rules are that are applicable to operation of this facility has been adopted since issuance of the initial Title V permit.

- 40 CFR 60 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines
- District Rule 4702, Internal Combustion Engines – Phase 2 (amended January 18, 2007)

B. Rules Not Updated

- District Rule 1080, Stack Monitoring (Amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1100, Equipment Breakdown¹ (amended December 17, 1992)
- District Rule 1160, Emission Statements¹ (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)

¹ Requirements of this rule addressed by Facility-Wide Umbrella Template SJV-UM-0-3

- District Rule 2031, Transfer of Permits¹ (amended December 17, 1992)
- District Rule 2020, Exemptions¹ (amended December 19, 2002)
- District Rule 2040, Applications (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 2201, New and Modified Stationary Source Review Rule (amended December 19, 2002)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4001, New Source Performance Standards (amended April 14, 1999)
- District Rule 4102, Nuisance (amended December 17, 1992)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate (amended December 17, 1992)
- District Rule 4601, Architectural Coatings¹ (amended October 31, 2001)
- District Rule 4701, Internal Combustion Engines – Phase I (amended August 21, 2003)
- District Rule 4703, Stationary Gas Turbines (amended April 25, 2002)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 7012, Hexavalent Chromium – Cooling Towers (amended December 17, 1992)
- District Rule 8031, Bulk Materials¹ (adopted November 15, 2001)

¹ Requirements of this rule addressed by Facility-Wide Umbrella Template SJV-UM-0-3

- District Rule 8041, Carryout and Trackout¹ (adopted November 15, 2001)
- District Rule 8051, Open Areas¹ (adopted November 15, 2001)
- District Rule 8061, Paved and Unpaved Roads (adopted November 15, 2001)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas¹ (adopted November 15, 2001)
- 40 CFR Part 60, Subpart A, General Provisions
- 40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines
- 40 CFR Part 64, Compliance Assurance Monitoring
- 40 CFR Part 72, Permits Regulation
- 40 CFR Part 73, Sulfur Dioxide Allowance System
- 40 CFR Part 75, Continuous Emission Monitoring
- 40 CFR Part 77, Excess Emissions

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".

Condition 41 for permit -0-3, previously condition 1 of -0-2, shows compliance with District Rule 4102 and is not federally enforceable.

- Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines

¹ Requirements of this rule addressed by Facility-Wide Umbrella Template SJV-UM-0-3

All requirements of District Rule 4702 are more stringent and are federally enforceable so conditions 3, 4, 5, 6 and 7 of the Draft PTO ensure compliance with this regulation.

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.

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

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable to the permits being renewed as a part of this project.

However, the facility applied for, received, and implemented Authority to Construct for N-2697-1-6 with this renewal. The modification performed in this ATC will be reflected in the facility's renewed TV permit.

B. District Rule 4101 - Visible Emissions

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or

darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

Condition 22 of permit unit -0-3 ensures compliance.

C. District Rule 4702 – Internal Combustion Engines

Pursuant to Section 7.5.2.3 of District Rule 4702, as of June 1, 2006 District Rule 4701 is no longer applicable to diesel-fired emergency standby or emergency IC engines.

Pursuant to Section 4.3, except for the requirements of Section 6.2.3, the requirements of this rule shall not apply to an internal combustion engine that meets the following conditions:

- 1) The engine is operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood, and
- 2) Except for operations associated with Section 4.3.1.1, the engine is limited to operate no more than 100 hours per calendar year as determined by an operational nonresettable elapsed operating time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine, and
- 3) The engine is operated with a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Section 6.2.3 requires that an owner claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and submitted to the APCO upon request and at the end of each calendar year in a manner and form approved by the APCO.

Conditions 4, 5 and 6 of the draft PTO -4-3 ensure compliance with this rule.

D. 40 CFR 60 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines

The EPA promulgated this new NSPS that would apply to new stationary combustion turbines greater than or equal to 1 MW that commence construction, modification or reconstruction after February 18, 2005. The gas turbine permit unit N-2697-1-4 was initially constructed before February 18, 2005 and not been modified or reconstructed since. Therefore requirements of this NSPS are not applicable.

E. 40 CFR Part 60, Subpart GG, Standard of Performance for Stationary Gas Turbines

This requirement limits emissions of nitrogen oxides. Emissions shall not exceed a NO_x emission rate of 75 ppmv or 150 ppmv, depending on the unit size (at 15% O₂ with the ISO correction factor). The following analysis shows that the proposed requirement of District Rule 4703 is more stringent than 40 CFR requirements pertaining to NO_x emissions. Streamlining procedures, as documented in the following steps is utilized to substitute the proposed set of requirements for the otherwise applicable requirements.

The following table has side-by-side comparison of applicable requirements:

Northern California Power Agency
 Facility ID: N-2697
 Project #: N-1082034

| Type of Requirement | District Rule 4703 | Subpart GG, § 60.332, 60.333 and 60.334 | Proposed Requirement |
|----------------------|---|--|---|
| Emissions Limit | Section 5.1.2 - for > 10 MW, 5 ppmv @ 15% O ₂ . (Tier II Standard Option) | 60.332(a)(1) – 75 ppmv @ 15% O ₂ . (Lowest possible concentration) 60.333(a) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015% by volume at 15% oxygen and on a dry basis. | 3 ppmv @ 15% O ₂ . |
| Work place standards | N/A | 60.333(b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel, which contains sulfur in excess of 0.8% by weigh (8000 ppmw). | This unit shall be fired exclusively on PUC-quality natural gas which has a total sulfur content of less than or equal to 1.0 gr/100 scf |
| Monitoring | (6.2.1) Except for units subject to Section 6.2.3, for turbines with exhaust gas NO _x control devices, the owner or operator shall either install, operate, and maintain continuous emissions monitoring equipment for NO _x and oxygen, as identified in Rule 1080 (Stack Monitoring), or install and maintain APCO-approved alternate monitoring | 60.334(a) The owner or operator of any stationary gas turbine subject to the provisions of this subpart and using water injection to control NO _x emissions shall install or operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. 60.334(b) Install, certify, maintain, operate, and quality-assure a continuous emissions monitoring system for NO _x and O ₂ . 60.334(h)(3) The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) demonstrated by representative fuel sampling data which shows that sulfur content of gas does not exceed 0.25 gr/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of Appendix D of 40 CFR part 75 is required | The owner or operator shall install, , certify, maintain, operate, and quality-assure a system which continuously measures and records the exhaust gas NO _x and O ₂ concentrations. The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six (6) months. If any six (6) month monitoring show exceedance, weekly monitoring shall resume and exceedance shall be reported to APCO |

| Type of Requirement | District Rule 4703 | Subpart GG, § 60.332, 60.333 and 60.334 | Proposed Requirement |
|---------------------|--|---|--|
| Reporting | As per District Rule 1080: Time intervals, data and magnitude of excess NOx emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative, except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred | 60.334(J) the owner or operator shall submit reports of excess emissions and monitor downtime as required under §60.7(c), periods of excess emissions that shall be reported are defined as follows: 60.334(J)(1)(iii) - An hour of excess emissions shall be any operating hour in which 4-hour rolling average NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or diluent (or both). 60.334(J)(5): all reports required under §60.7(c) shall be post marked by 30 th day following the end of each calendar quarter. | 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 NOx emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission 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. Excess emissions shall be defined as any operating hour in which 4-hour rolling average NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or diluent (or both) |
| Testing | Annual Testing for nitrogen oxides (NOx) concentrations using EPA Method 20 or 7E and oxygen (O ₂) using Method 3, 3A, or 20. | Initial NOx performance testing using EPA method 20 or 7E and EPA method 3, 3A for O ₂ . | Annual Testing for nitrogen oxides (NOx) concentrations using EPA Method 20 or 7E and oxygen (O ₂) using Method 3, 3A, or 20. |

The District Rule 4703 requirement to limit NOx concentration to 5 ppmv @ 15% O₂ is clearly more stringent than the Subpart GG emissions limit of 75 ppmv as discussed below. Condition 27 to the draft PTO assures compliance with this requirement.

Compliance with SO_x Emission Concentration Limit - 60.333(a):

Natural gas suppliers in California (PG&E, SOCal Gas, etc) regulate the quality of the gas as following:

- Pacific Gas & Electric (PG&E) has a transportation agreement to deliver gas with a maximum total sulfur content of 1.0 gr/100 scf (actual: 0.3 to 0.5 gr/100 scf, based on source testing).

- Southern California Edison's (SoCal Gas) Standard Specifications for Natural Gas and Substitute Fuel Gases (from SoCal Gas Company Procedures, 12/26/85) has a recommended total sulfur limit of 0.75 gr/100 scf.
- Mojave Gas Company's FERC Gas Tariff General Terms and Conditions (12/30/91) requires delivered natural gas to contain no more than 0.75 gr/100 scf total sulfur.

The California Air Resource Board (ARB), in their document Guidance for Power Plant Siting (Stationary Source Div., 6/99), also determined that 1.0 gr S/100 scf is the sulfur content of gas supplied by a utility regulated by the Public Utilities Commission (PUC).

All natural gas that is regulated enters the PUC pipeline for distribution to consumers and is tested to assure that its composition conforms to above standards. Therefore, total sulfur content of 1.0 gr/100 scf is consistent with quality of gas supplied by the utilities.

Compliance is expected as shown by the following calculations at 1 grain of total sulfur per 100 standard cubic feet of gas, assuming all sulfur is converted to SO₂.

$$\begin{aligned} \%S(\text{lb/lbNG}) &= \left(\frac{1 \text{ gr}}{100 \text{ scf}} \right) \left(\frac{1 \text{ lb}}{7000 \text{ gr}} \right) \left(\frac{24.5 \text{ L}}{\text{mol NG}} \right) \left(\frac{1 \text{ mol}}{16 \text{ g}} \right) \left(\frac{454 \text{ g}}{1 \text{ lb}} \right) \left(\frac{0.035 \text{ scf}}{1 \text{ L}} \right) (100) \\ &= 0.00348\% \text{ sulfur by weight} \end{aligned}$$

$$\begin{aligned} \text{lb SO}_2/\text{scf gas} &= (0.0000348)(1 \text{ lb}/23.8 \text{ scf gas})(64 \text{ lb SO}_2/32 \text{ lb S}) \\ &= 2.92 \text{ E-}6 \text{ lb SO}_2/\text{scf gas} \end{aligned}$$

$$\text{lb SO}_2/V_{\text{exhaust}} = (\text{lb SO}_2/\text{scf gas}) \div (\text{F factor}) (\text{Btu content of natural gas})$$

$$\left(\frac{\text{lb SO}_2}{V_{\text{exhaust}}} \right) = \frac{\left(2.92 \text{ E-}6 \frac{\text{lb SO}_2}{\text{scf gas}} \right) \left(\frac{10^6 \text{ Btu}}{\text{MMBtu}} \right)}{\left(8710 \frac{\text{dscf}}{\text{MMBtu}} \right) \left(1000 \frac{\text{Btu}}{\text{scf}} \right)} = 3.35 \text{ E-}7 \frac{\text{lb SO}_2}{\text{dscf exhaust}}$$

$$V_{\text{SO}_2}/V_{\text{exhaust}} = nRT/P$$

where,

$$\begin{aligned} n &= \text{moles SO}_2 = (3.35 \text{ E-}7 \text{ lb SO}_2/\text{dscf exhaust}) / (64 \text{ lb SO}_2/\text{lb-mol}) \\ R &= \text{universal gas constant} = 10.73 \text{ psi-ft}^3/\text{lb-mol-R} \\ T &= \text{standard temperature} = 60 \text{ F} = 520 \text{ R} \\ P &= \text{standard pressure} = 14.7 \text{ psi} \end{aligned}$$

$$\text{Therefore, } \left(\frac{V_{SO_2}}{V_{\text{exhaust}}} \right) = \frac{\left(\frac{3.35 \text{ E} - 6 \text{ lb } SO_2}{\text{dscf}_{\text{exhaust}}} \right) \left(\frac{10.73 \text{ psi} - \text{ft}^3}{\text{lb} - \text{mole} - ^\circ\text{R}} \right) (520 ^\circ\text{R})}{\left(\frac{64 \text{ lb } SO_2}{\text{lb} - \text{mol}} \right) (14.7 \text{ psi})} = 1.99\text{E} - 6 \frac{\text{dscf}}{\text{dscf}_{\text{exhaust}}}$$

$$= 1.99 \text{ ppmv dry}$$

Diluting it to 15% O₂

$$\text{ppmv @ 15\% O}_2 = \text{ppmv dry} \times \left(\frac{20.9 - 15}{20.9} \right) = 0.56 \text{ ppmv}$$

0.56 ppmv << 150 ppmv.

Compliance with 150 ppmv SO_x at 15% excess O₂ and dry standard conditions and 2,000 ppmv is assured because the unit has a fuel sulfur content of 1.0 gr/100 scf. Condition 34 of the permit ensures compliance with this rule and condition 29 of PTO N-2697-1-3 has been removed since it is redundant with this condition.

Compliance with Sulfur Fuel Content Limit - 60.333(b):

Natural gas with fuel sulfur content of 1.0 gr/100 scf or less assures compliance with the 0.8% sulfur by weight limit of New Source Performance Standard, Subpart GG - 40 CFR Subpart 60.333(b). This standard can be converted to an expression of weight percent of sulfur in the natural gas (ng):

$$\%S(\text{lb}/\text{lbNG}) = \left(\frac{1 \text{ gr}}{100 \text{ scf}} \right) \left(\frac{1 \text{ lb}}{7000 \text{ gr}} \right) \left(\frac{24.5 \text{ L}}{\text{mol NG}} \right) \left(\frac{1 \text{ mol}}{16 \text{ g}} \right) \left(\frac{454 \text{ g}}{1 \text{ lb}} \right) \left(\frac{0.035 \text{ scf}}{1 \text{ L}} \right) (100)$$

$$= 0.00348\% \text{ sulfur by weight}$$

Thus natural gas with fuel sulfur content of 1.0 gr/100 scf or less assures compliance with the 0.8% sulfur by weight limit of New Source Performance Standard, Subpart GG - 40 CFR Subpart 60.333(b).

G. 40 CFR Part 64-CAM

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) 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.

a. N-2697-1-4 – Gas Turbine

The unit is not subject to CAM for PM₁₀ or SO_x because it does not have add-on controls for either of those pollutants.

The unit has continuous emission monitors (CEMS) for NO_x and CO so CAM is not applicable and the equipment is exempt from CAM requirements. The standard conditions that require the CEMs to be installed, calibrated, maintained, and require the data to be reported ensure that the equipment will remain exempt from CAM requirements.

ATC N-2697-1-6 established an annual VOC limit of 19,992 lb-VOC/year, therefore this unit is not subject to CAM for VOC emissions because the major source threshold is not surpassed for controlled VOC emissions.

b. N-2697-4-3 – Emergency IC Engine

The unit is not subject to CAM for VOC, CO, PM₁₀ or SO_x because it does not have an emission limit for any of those pollutants.

The unit is not subject to CAM for NO_x because it does not have a pre-control potential to emit of greater than the major source threshold.

H. 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.150 of this Subpart was amended September 18, 2003, and condition 36 of N-2697-0-3 assures compliance with the requirements.

I. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2004 and 2008, and conditions 28 and 29 of N-2697-0-3 assure compliance with the requirements.

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

1. Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template is included as conditions 38 and 39 of the facility-wide requirements (N-2697-0-3).

The applicant does not propose to use any other model general permit templates.

B. Requirements not Addressed by Model General Permit Templates

The applicant has not requested a permit shield based on any permit requirements or for any subsumed requirements.

C. Permit Shields From Existing Permit Requirements

a. N-2697-1-4 – Gas Turbine

The following permit shields will be retained with the issuance of the renewal.

Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8(a), (c), (d), and 60.13(b); District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 7.0, 7.1, 7.2, 7.3, 8.0, 9.0, 10.0, and 11.0; and 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Y

Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a)(1), (b), 60.333 (b); 60.334, (b)(1), (b)(2), (b)(3), (h)(3), (i)(2), (j)(3); 60.335(a), (b)(1), (b)(2), and (b)(10)(ii); and District Rule 4703 (as amended 4/25/02), Sections 5.1.1, 5.2, 6.1, 6.3.1, 6.3.3, 6.4, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Y

Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Y

b. N-2697-4-3 – Emergency IC Engine

The following permit shields will be retained with the issuance of the renewal.

Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Y

X. PERMIT CONDITIONS

See Attachment A - Renewed Title V Operating Permit.

XI. ATTACHMENTS

- A. Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. District Responses to EPA Comments
- E. District Responses to Facility Comments

ATTACHMENT A

Renewed Title V Operating Permit



Permit to Operate

FACILITY: N-2697

EXPIRATION DATE: 05/31/2014

LEGAL OWNER OR OPERATOR:

NORTHERN CALIFORNIA POWER

MAILING ADDRESS:

651 COMMERCE DR
ROSEVILLE, CA 95678

FACILITY LOCATION:

12745 N THORNTON RD
LODI, CA 95241

FACILITY DESCRIPTION:

COGENERATION FACILITY

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

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Executive Director / APCO

David Warner

Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: N-2697-0-3

EXPIRATION DATE: 05/31/2014

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 (3/21/02). [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 9.12.1] 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: NORTHERN CALIFORNIA POWER
Location: 12745 N THORNTON RD, LODI, CA 95241
N-2697-0-3 : Feb 22 2010 1:29PM - MASLOWST

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 (11/15/01). 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 the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) 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 (10/31/01). [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 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 82, Subpart B. [40 CFR 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] 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), and Rule 111 (Kern, Tulare, Kings). 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 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). 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. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon January 1 of each year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of 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: N-2697-1-4

EXPIRATION DATE: 05/31/2014

EQUIPMENT DESCRIPTION:

ONE (1) GENERAL ELECTRIC LM5000 NATURAL GAS FIRED GAS TURBINE ENGINE WITH STEAM INJECTION, SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION, AND AN OXIDIZATION CATALYST SERVING A 49 MW ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired exclusively on PUC-quality natural gas. [District NSR Rule, 40 CFR 60.333(b); Rule 407 (San Joaquin County)] Federally Enforceable Through Title V Permit
2. Operator shall operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation, and the exhaust gas NO_x, CO and O₂ concentrations. [40 CFR 60.334 (b)(1), District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
3. The turbine and associated ancillary equipment must be maintained and kept in good operating condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A selective catalytic reduction (SCR) system shall be installed in the path of the heat recovery boiler where the temperature range is 450 to 750 degrees F. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A SCR system shall have an effective catalyst volume of at least 100 cubic feet at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The catalyst bed and other components of the SCR system shall be made available for visual inspection by the District at least once a year. The District shall be notified at least 30 days prior to scheduling such inspection. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The turbine shall be equipped with a CO catalyst to reduce CO and NMHC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The turbine shall be equipped with an automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The permittee shall provide a continuous temperature monitoring and recording system to indicate the flue gas temperature through the SCR system. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The stack height shall be minimum of 50 feet, and shall be adequate for stack sampling pursuant to EPA reference methods for source testing. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [40 CFR 60.334(b)(2) and District Rule 1080, 6.4]
12. The NO_x and O₂ CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2 and 3, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(1) and, District Rules 1080, 6.3, 6.5, 6.6, & 7.2 and 4703 6.3.2]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. 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 emission measurements. [District Rule 40 CFR 60.7(b) and District Rule 1080, 7.3]
14. Excess emissions shall be defined as any operating hour in which 4-hour rolling average NO_x concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NO_x or O₂ (or both). [District Rule 40 CFR 60.334(J)(1)(iii)]
15. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0]
16. Performance testing shall be conducted annually to measure NO_x and CO emission concentrations using the following test methods: EPA Methods 7E or 20 for NO_x emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. The 9-run tests shall be performed at highest physically achievable load of the gas turbine. [40 CFR 60.335(a), (b)(7) and District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3]
17. Operations during periods of startup or shutdown shall not constitute representative conditions for the purpose of a NO_x performance test nor shall NO_x emissions in excess of the level of the emission limit shown in this permit during periods of startup and shutdown be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard. [40 CFR 60.8(c)] Federally Enforceable Through Title V Permit
18. Results of the CEM system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13(h). [40 CFR 60.13(h), and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
19. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation type and quantity of fuel used. [District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
20. Operators of CEM systems installed at the direction of the APCO shall submit a written report 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 emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative, except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [40 CFR 60.334 (j)(5) and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
21. The fuel consumption, based on the higher heating value of the fuel, shall not exceed 463 million Btu in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
22. All emissions during start-up and shutdown periods shall be counted towards the applicable daily emissions limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The daily emission rates shall be calculated based on the hourly average stack concentrations and the calculated stack gas flowrates. [District NSR Rule] Federally Enforceable Through Title V Permit
24. The continuous emissions monitoring equipment shall be calibrated at least once per day. Relative Accuracy Testing shall be performed annually in accordance with 40 CFR Part 60, Appendices B & F or Part 75 if approved by the EPA. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
26. The unit shall comply with the Rule 4703 NO_x limit of 5 ppmvd @ 15% O₂ within two hours of the commencement of start-up and shut-down periods as defined in Rule 4703. Within three hours of commencing the start-up or shutdown sequence, the NO_x emissions shall not exceed 3.0 ppmvd @ 15% O₂ over a three hour rolling average. [District Rules 2201 and 4703] 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 unit shall comply with the Rule 4703 CO limit of 200 ppmvd @ 15% O₂ within two hours of the commencement of start-up and shutdown periods as defined in Rule 4703. Within three hours of commencing the start-up or shutdown sequence, the CO emissions shall not exceed 200 ppmvd @ 15% O₂ over a three hour rolling average [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
28. The ammonia slip shall not exceed 25 ppmv, dry, corrected to 15% O₂. [District Rule 4102]
29. The NO_x emissions shall not exceed 112.0 pounds during any one day when burning natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
30. The PM₁₀ emissions shall not exceed 48.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
31. The CO emissions shall not exceed 322.0 pounds in any one day when burning natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
32. The VOC emissions shall not exceed 142.0 pounds in any one day and 19,992 pounds in any one year. [District NSR Rule] Federally Enforceable Through Title V Permit
33. The fuel sulfur content shall not exceed 1.0 gr/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
34. There shall be no visible emissions (except for uncombined water) from the entire system except during periods of startup and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. The owner or operator shall conduct and provide source test information annually regarding the exhaust gas NO_x and CO concentration corrected to 15% O₂ (dry). EPA Methods 7E or 20 shall be used for NO_x emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [40 CFR 60.335(a), District NSR Rule and District Rules 2520, Section 9.3.2, 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Federally Enforceable Through Title V Permit
37. The owner or operator shall conduct and provide source test information annually regarding, the NH₃ emissions, and shall be measured using BAAQMD Method ST-1B. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
38. The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six (6) months. If any six (6) month monitoring show exceedance, weekly monitoring shall resume and exceedance shall be reported to APCO [40 CFR 60.335(h)(3)] Federally Enforceable Through Title V Permit
39. The operator shall submit a quarterly report of excess emissions and monitor downtime as defined and specified in 40 CFR 60.334 (b)(3) and (j). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. [40 CFR 60.334 (b)(3) and 40 CFR 60.7 (c)] Federally Enforceable Through Title V Permit
40. A daily log showing the hourly rate of ammonia injection and the pressure drop across the catalyst shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
41. The owners and operators of each affected source and each affected unit at the source shall have an Acid Rain permit and operate in compliance with all permit requirements. [40 CFR 72] Federally Enforceable Through Title V Permit
42. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] 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.

43. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
44. The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit
45. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit
46. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit
47. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit
48. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit
49. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit
50. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
51. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
52. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit
53. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
54. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit
55. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4703] 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.

56. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
57. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a)(1), (b), 60.333 (b); 60.334, (b)(1), (b)(2), (b)(3), (h)(3), (i)(2), (j)(3); 60.335(a), (b)(1), (b)(2), and (b)(10)(ii); and District Rule 4703 (as amended 4/25/02), Sections 5.1.1, 5.2, 6.1, 6.3.1, 6.3.3, 6.4, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
58. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8(a), (c), (d), and 60.13(b); District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 7.0, 7.1, 7.2, 7.3, 8.0, 9.0, 10.0, and 11.0; and 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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: N-2697-4-3

EXPIRATION DATE: 05/31/2014

EQUIPMENT DESCRIPTION:

240 HP CUMMINS MODEL 6CTA8.3-F1 DIESEL FIRED IC ENGINE WITH A TURBOCHARGER AND AFTERCOOLER SYSTEM POWERING AN EMERGENCY FIRE PUMP

PERMIT UNIT REQUIREMENTS

1. The NOx emissions rate shall not exceed 6.12 g/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] 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 and 17 CCR 93115] 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, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. This engine shall be operated only for maintenance, testing, and 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, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. 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, 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 Rules 4702, 6.2 and 2520, 9.3.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520, 9.3.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Previous Title V Operating Permit



Permit to Operate

FACILITY: N-2697

EXPIRATION DATE: 05/31/2009

LEGAL OWNER OR OPERATOR:

NORTHERN CALIFORNIA POWER

MAILING ADDRESS:

651 COMMERCE DR
ROSEVILLE, CA 95678

FACILITY LOCATION:

12745 N THORNTON RD
LODI, CA 95241

FACILITY DESCRIPTION:

COGENERATION FACILITY

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

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Executive Director / APCO

David Warner

Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: N-2697-0-2

EXPIRATION DATE: 05/31/2009

FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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
3. 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
4. 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
5. 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 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
6. 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 9.12.1] Federally Enforceable Through Title V Permit
7. 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
8. 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
9. 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
10. 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: NORTHERN CALIFORNIA POWER
Location: 12745 N THORNTON RD, LODI, CA 95241
N-2697-0-2: Feb 22 2010 12:47PM - MASLOWST

11. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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
18. 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
19. 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
20. 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
21. 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
22. 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
23. 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 (11/15/01). 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.

24. 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 the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
25. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
27. 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
28. 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 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
29. 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 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
30. 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
31. 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
32. 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
33. 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
34. 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
36. 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.

37. 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
38. 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
39. 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
40. 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), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. 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 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of each 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: N-2697-1-6

EXPIRATION DATE: 05/31/2009

EQUIPMENT DESCRIPTION:

ONE GENERAL ELECTRIC LM5000 NATURAL GAS FIRED GAS TURBINE ENGINE WITH STEAM INJECTION, SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION, AND AN OXIDIZATION CATALYST SERVING A 49 MW ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired solely on PUC-quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Operator shall operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation, and the exhaust gas NO_x, CO and O₂ concentrations. [40 CFR 60.334 (b)(1)(2), District NSR Rule and District Rule 1080] Federally Enforceable Through Title V Permit
3. The turbine and associated ancillary equipment must be maintained and kept in good operating condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A selective catalytic reduction (SCR) system shall be installed in the path of the heat recovery boiler where the temperature range is 450 to 750 degrees F. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A SCR system shall have an effective catalyst volume of at least 100 cubic feet at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The catalyst bed and other components of the SCR system shall be made available for visual inspection by the District at least once a year. The District shall be notified at least 30 days prior to scheduling such inspection. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The turbine shall be equipped with a CO catalyst to reduce CO and NMHC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The turbine shall be equipped with an automatic air/fuel ratio control system. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The permittee shall provide a continuous temperature monitoring and recording system to indicate the flue gas temperature through the SCR system. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The stack height shall be minimum of 50 feet, and shall be adequate for stack sampling pursuant to EPA reference methods for source testing. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080, 7.2] Federally Enforceable Through Title V Permit
12. The NO_x CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080, 6.4 and 40 CFR 60.334(b)(2)] 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.

13. The continuous NO_x and O₂ monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix F, and Part 60, Appendix B, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080, 6.7] Federally Enforceable Through Title V Permit
14. A violation of NO_x emission standards indicated by the NO_x CEM shall be reported by the operator to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
15. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEM. Operator shall inform the APCO of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
16. Operations during periods of startup or shutdown shall not constitute representative conditions for the purpose of a NO_x performance test nor shall NO_x emissions in excess of the level of the emission limit shown in this permit during periods of startup and shutdown be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard. [40 CFR 60.8(c)] Federally Enforceable Through Title V Permit
17. The owner or operator shall maintain records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEM system that has been installed pursuant to District Rule 1080 (as amended 12/17/92), and emission measurements. [40 CFR 60.7(b) and District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
18. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
19. Results of the CEM system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13(h). [40 CFR 60.13(h), and District Rule 4703; 5.1, 6.4] Federally Enforceable Through Title V Permit
20. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. Operators of CEM systems installed at the direction of the APCO shall submit a written report 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 emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative, except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [40 CFR 60.334 (j)(5) and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
22. The fuel consumption, based on the higher heating value of the fuel, shall not exceed 463 million Btu in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
23. All emissions during start-up and shutdown periods shall be counted towards the applicable daily emissions limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
24. The daily emission rates shall be calculated based on the hourly average stack concentrations and the calculated stack gas flow rates. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The continuous emissions monitoring equipment shall be calibrated at least once per day. Relative Accuracy Testing shall be performed annually in accordance with 40 CFR Part 60, Appendices B & F or Part 75 if approved by the EPA. [District Rule 2080] Federally Enforceable Through Title V Permit
26. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] 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 unit shall comply with the Rule 4703 NO_x limit of 5 ppmvd @ 15% O₂ within two hours of the commencement of start-up and shut-down periods as defined in Rule 4703. Within three hours of commencing the start-up or shutdown sequence, the NO_x emissions shall not exceed 3.0 ppmvd @ 15% O₂ over a three hour rolling average. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
28. The unit shall comply with the Rule 4703 CO limit of 200 ppmvd @ 15% O₂ within two hours of the commencement of start-up and shutdown periods as defined in Rule 4703. Within three hours of commencing the start-up or shutdown sequence, the CO emissions shall not exceed 200 ppmvd @ 15% O₂ over a three hour rolling average [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
29. Sulfur compound emissions shall not exceed 0.0152% by volume, 150 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
30. The ammonia slip shall not exceed 25 ppmv, dry, corrected to 15% O₂. [District Rule 4102]
31. The NO_x emissions shall not exceed 112.0 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
32. The PM₁₀ emissions shall not exceed 48.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
33. The CO emissions shall not exceed 322.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The VOC emissions shall not exceed 142.0 pounds during any one day and 19,992 pounds in any one year. [District NSR Rule] Federally Enforceable Through Title V Permit
35. The fuel sulfur content shall not exceed 1.0 gr/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
36. There shall be no visible emissions (except for uncombined water) from the entire system except during periods of startup and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. The owner or operator shall be required to conform to the compliance testing and sampling procedures described in District Rule 1081 (as amended 12/16/93). [District Rule 1081] Federally Enforceable Through Title V Permit
39. The owner or operator shall conduct and provide source test information annually regarding the exhaust gas NO_x and CO concentration corrected to 15% O₂ (dry). EPA Methods 7E or 20 shall be used for NO_x emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [40 CFR 60.8(a), 40 CFR 60.335(a)(b), District NSR Rule and District Rules 2520, Section 9.3.2, 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Federally Enforceable Through Title V Permit
40. The owner or operator shall conduct and provide source test information annually regarding, the NH₃ emissions, and shall be measured using BAAQMD Method ST-1B. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
41. Source testing shall be conducted using the methods outlined in this permit and procedures approved by the District. 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 thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
42. If the turbine is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] 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.

43. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 4468, D 6667 or D 3246. [40 CFR 60.335(b)(10)(ii)] Federally Enforceable Through Title V Permit
44. If the turbine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be documented in a valid purchase contract, a supplier certification, tariff or transportation contract or tested daily in accordance with the requirements of 40 CFR 60.334 (h)(3) or (i)(2). [40 CFR 60.334(h)(3) and (i)(2)] Federally Enforceable Through Title V Permit
45. The operator shall submit a quarterly report of excess emissions and monitor downtime as defined and specified in 40 CFR 60.334 (b)(3) and (j). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. [40 CFR 60.334 (b)(3) and (j)] Federally Enforceable Through Title V Permit
46. A daily log showing the hourly rate of ammonia injection and the pressure drop across the catalyst shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
47. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a)(1), (b), 60.333 (b); 60.334, (b)(1), (b)(2), (b)(3), (h)(3), (i)(2), (j)(3); 60.335(a), (b)(1), (b)(2), and (b)(10)(ii); and District Rule 4703 (as amended 4/25/02), Sections 5.1.1, 5.2, 6.1, 6.3.1, 6.3.3, 6.4, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
49. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8(a), (c), (d), and 60.13(b); District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 7.0, 7.1, 7.2, 7.3, 8.0, 9.0, 10.0, and 11.0; and 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
50. The owners and operators of each affected source and each affected unit at the source shall have an Acid Rain permit and operate in compliance with all permit requirements. [40 CFR 72] Federally Enforceable Through Title V Permit
51. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
52. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
53. The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit
54. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit
55. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit
56. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] 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.

57. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit
58. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit
59. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
60. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
61. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit
62. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
63. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit
64. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4703] 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: N-2697-4-2

EXPIRATION DATE: 05/31/2009

EQUIPMENT DESCRIPTION:

240 HP CUMMINS MODEL 6CTA8.3-F1 DIESEL FIRED IC ENGINE WITH A TURBOCHARGER AND AFTERCOOLER SYSTEM POWERING AN EMERGENCY FIRE PUMP

PERMIT UNIT REQUIREMENTS

1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
2. Unit shall be fired only on diesel fuel with a sulfur content of less than 0.05% by weight. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
3. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the IC engine is not fired on ARB regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, then the owner or operator shall determine the sulfur content of each delivery of diesel fuel being fired in the IC engine. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. The NOx emissions rate shall not exceed 6.12 grams/BHP-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
7. 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 200 hours per year. [District NSR Rule and District Rule 4701, 4.2.1] Federally Enforceable Through Title V Permit
8. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the number of hours of operation, the purpose of the operation (e.g., load testing, weekly testing, rolling blackout, general area power outage, etc.), and the sulfur content of the diesel fuel used. Such records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 1070 and Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=2697
Sorted by Facility Name and Permit Number

| | | | | | | |
|--|------------|----------------|-----------|--------|-------------|------------|
| NORTHERN CALIFORNIA POWER 12745 N THORNTON RD LODI, CA 95241 | FAC # | N 2697 | TYPE: | TitleV | EXPIRE ON: | 05/31/2014 |
| | STATUS: | A | TOXIC ID: | 51363 | AREA: | 11 / |
| | TELEPHONE: | (209) 333-6370 | | | INSP. DATE: | 04/10 |

| PERMIT NUMBER | FEE DESCRIPTION | FEE RULE | QTY | FEE AMOUNT | FEE TOTAL | PERMIT STATUS | EQUIPMENT DESCRIPTION |
|---------------|-----------------|------------|-----|------------|-----------|---------------|---|
| N-2697-1-4 | 49,000 kw | 3020-08A G | 1 | 10,215.00 | 10,215.00 | A | ONE (1) GENERAL ELECTRIC LM5000 NATURAL GAS FIRED GAS TURBINE ENGINE WITH STEAM INJECTION, SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION, AND AN OXIDIZATION CATALYST SERVING A 49 MW ELECTRICAL GENERATOR |
| N-2697-4-3 | 240 bhp | 3020-10 C | 1 | 240.00 | 240.00 | A | 240 HP CUMMINS MODEL 6CTA8.3-F1 DIESEL FIRED IC ENGINE WITH A TURBOCHARGER AND AFTERCOOLER SYSTEM POWERING AN EMERGENCY FIRE PUMP |

Number of Facilities Reported: 1

ATTACHMENT D

District Response to EPA comments

EPA Comment 1: Overall Permit Review

There are two elements the District's Title V permit evaluation fails to address. First, is 40 CFR 63 Subpart ZZZZ, which became effective on March 18, 2008. This NESHAP applies to internal combustion engines located at both major and area sources of HAP (basically all sources with a RICE). As part of the Title V renewal process, the District must evaluate the applicability of this regulation and add any conditions necessary to ensure compliance. The second missing element is an evaluation of the Title IV permit renewal. When the District's Title V program was approved by EPA, the District also became the Title IV permitting authority for all subject sources. Thus the Title V permit renewal evaluation must also discuss the Title IV permit renewal, determining if there are any changes to the underlying regulations or any need to revise any existing conditions based on Title IV requirements. At a minimum, the District must confirm that the Title IV permit is also being renewed, and that all of the applicable Title IV requirements are incorporated into the Title V permit.

District's Response

§6590(a) states, "An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand."

§6590(a)(1) defines the criteria for an existing stationary RICE as follows:

- (i) For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.
- (ii) For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
- (iii) 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.
- (iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

This facility is an area source of HAP emissions. The engines at this facility have not commenced construction or reconstruction on or after June 12, 2006. Therefore, the

engines at this facility meet the definition of an existing stationary RICE as defined in §6590(a)(1)(iii).

§6590(b)(3) states that the following engines do not have to meet the requirements of this subpart and of subpart A of this part:

- stationary RICE which is an existing spark ignition 4 stroke rich burn (4SRB) stationary RICE located at an area source,
- existing spark ignition 4SRB stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source, an existing spark ignition 2 stroke lean burn (2SLB) stationary RICE,
- existing spark ignition 4 stroke lean burn (4SLB) stationary RICE,
- existing compression ignition (CI) stationary RICE,
- existing emergency stationary RICE,
- existing limited use stationary RICE, or
- existing stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis

The engines at this facility are existing emergency stationary RICE. Therefore, the engines do not have to meet the requirements of this subpart and of subpart A of this part. No further discussion is required.

The Title IV requirements for this facility are already being addressed by conditions 47 through 62 of permit -1 therefore the Title IV permit has been updated and no further discussion is required.

Comment 2: CAM applicability for VOC

On page 13 of the evaluation, under Section G. 3) a., the District states that the major source threshold is surpassed for controlled VOC emissions. In addition, Condition 7 of the proposed permit states that the turbine shall be equipped with a CO catalyst to reduce CO and NMHC. Thus both CAM applicability requirements are met and VOC emissions are subject to CAM requirements. The District however, incorrectly states that since the oxidation catalyst for CO also reduces VOC emission, CAM is satisfied by the CO CEMS. While operation of the oxidation catalyst does reduce some quantity of NMHC, without a CEMS to measure VOC emission rates, the CAM provision which requires the collection of 4 data points per hour to ensure compliance with the stated VOC emission limits is not met. CAM requirements may be met by either installing a VOC CEMS, or by determining a minimum inlet temperature to the oxidation catalyst which will ensure VOC emissions are below the stated daily emission limit of 142 lbs/day. A condition requiring that the inlet temperature be monitored on a continuous basis would then be added to satisfy CAM requirements. Please review this issue and revise the permit as necessary.

District's Response

Northern California Power Agency submitted an Authority to Construct (ATC) (N-2697-1-6) with COC to lower their annual emissions from N-2697-4 to 19,992 lb-VOC/year thereby exempting them from CAM requirements. This ATC was converted to the Title V operating permit and this document uses this as the base permit to conduct the permit renewal.

Comment 3: Permit unit N-2697-1-4

EPA notes that 40 CFR Part 60 Subpart GG has been revised since this Title V permit was last issued. While it appears the District has attempted to update the NSPS citations when used as the basis of various permit conditions, EPA notes the following errors that should be corrected.

| Condition # | Reads | Should Read |
|-------------|--------------------------|--------------------------|
| 2 | 60.334(b)(1)(2) | 60.334(b)(1) |
| 38 | 60.335(a)(b) | 60.335(a) |
| 38 | 60.8(a) | delete |
| 41 | 60.335(h)(3)(i) and (ii) | 60.334(h)(3) |
| 42 | 60.334(b)(3) and (j) | 60.334(b)(3) and 60.7(c) |

District's Response.

The following conditions have been modified to reflect the corrections in the above table:

2. Operator shall operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation, and the exhaust gas NO_x, CO and O₂ concentrations. [~~40 CFR 60.334 (b)(1)(2)~~; 40 CFR 60.334 (b)(1), District NSR Rule and District Rule 1080] Y

38. The owner or operator shall conduct and provide source test information annually regarding the exhaust gas NO_x and CO concentration corrected to 15% O₂ (dry). EPA Methods 7E or 20 shall be used for NO_x emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [~~40 CFR 60.8(a)~~, ~~40 CFR 60.335(a)(b)~~, 40 CFR

60.335(a), District NSR Rule and District Rules 2520, Section 9.3.2, 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Y

41. The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six (6) months. If any six (6) month monitoring show exceedance, weekly monitoring shall resume and exceedance shall be reported to APCO [~~40 CFR 60.335(h)(3)(i) and (ii)~~, 40 CFR 60.335(h)(3)] Y

42. The operator shall submit a quarterly report of excess emissions and monitor downtime as defined and specified in 40 CFR 60.334 (b)(3) and (j). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. [~~40 CFR 60.334 (b)(3) and (j)~~, CFR 60.334 (b)(3) and 40 CFR 60.7 (c)] Y

Comment 4: Permit unit N-2697-1-4

EPA would like to comment on the various conditions that contain CEMS requirements, see conditions 11, 13 and 25, in particular. Condition 11 references 40 CFR Part 51, Appendix P, which is cited in District Rules 1080 – Stack Monitoring. While this rule is SIP approved, Appendix P is an outdated citation for sources subject to NSR and NSPS CEM requirements. In addition, references to 40 CFR Part 60 Appendix B and F, and RATA testing requirements, are some what duplicate and incomplete. To address all of these issues, EPA encourages the District to use the new language EPA worked on with the District after NSPS Subpart GG was revised in July 2004. We are attaching a copy of the CEM related conditions we worked on with the District for your reference, along with the CEM conditions typically used for PSD permits.

In particular, 40 CFR Appendix B only pertains to initial CEMS certification and not ongoing CEM compliance. These provisions should be used whenever a new CEM unit is installed or there are major changes to the existing CEM unit or the existing emission unit, and thus normally appears in ATC conditions. When cited as a CEM requirement, the permit condition should also list the specific applicable performance specifications. For gas turbines, this will generally include PS's 2, 3 and 4a.

40 CFR Appendix F is where the specific RATA test requirements are found, so it is duplicative to list both requirements, as the District did in Condition 25. For Appendix F, Performance Specification 1 should be specified. This citation inherently includes the quarterly audit, as well as the annual audit.

District Response

The following outdated conditions will be removed from the permit:

~~11.— Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080, 7.2] Y~~

~~12.— The NO_x CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080, 6.4 and 40 CFR 60.334(b)(2)] Y~~

~~13.— The continuous NO_x and O₂ monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix F, and Part 60, Appendix B, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080, 6.7] Y~~

~~14.— A violation of NO_x emission standards indicated by the NO_x CEM shall be reported by the operator to the APCO within 96 hours. [District Rule 1080, 9.0] Y~~

~~15.— Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEM. Operator shall inform the APCO of the intent to shut down the CEM at least 24 hours prior to the event. [District Rule 1080, 10.0] Y~~

~~17.— The owner or operator shall maintain records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEM system that has been installed pursuant to District Rule 1080 (as amended 12/17/92), and emission measurements. [40 CFR 60.7(b) and District Rule 1080, 7.0] Y~~

~~18.— {2251} The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Y~~

~~37.— {2255} The owner or operator shall be required to conform to the compliance testing and sampling procedures described in District Rule 1081 (as amended 12/16/93). [District Rule 1081] Y~~

~~40.— Source testing shall be conducted using the methods outlined in this permit and procedures approved by the District. 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 thereafter. [District Rule 1081] Y~~

These conditions will be replaced by the gas turbine current template conditions (GT-1-3) for CEMS:

The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [40 CFR 60.334(b)(2) and District Rule 1080, 6.4]

The NO_x and O₂ CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2 and 3, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(1) and, District Rules 1080, 6.3, 6.5, 6.6, & 7.2 and 4703 6.3.2]

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 emission measurements. [40 CFR 60.7(b) and District Rule 1080, 7.3]

Excess emissions shall be defined as any operating hour in which 4-hour rolling average NO_x concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NO_x or O₂ (or both). [40 CFR 60.334(J)(1)(iii)]

APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0]

Performance testing shall be conducted annually to measure NO_x and CO emission concentrations using the following test methods: EPA Methods 7E or 20 for NO_x emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. The 9-run tests shall be performed at highest physically achievable load of the gas turbine. [40 CFR 60.335(a), (b)(7) and District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3]

ATTACHMENT E

District Response To Facility Comments

1. Cogeneration Facility Page 2 – Facility # N-2697 is not considered a 'Cogeneration facility'

District Response

Changed from Cogeneration facility to Lodi Plant

2. Contact Name Page 2 – Please change the Contact Name to Vinnie Venethongkham. Please change the contact phone to (209)33-6370 extension 109.

District Response

Made the above change.

3. Responsible Official Page 2 – Please change the Responsible Official to Ed Warner.

District Response

Made the above change.

4. Title Page 2 – Please change the title to Plant Manager.

District Response

Made the above change.

5. V. Scope of EPA and Public Review Page 3 – Please note that 'Condition 1 through 40 of the requirements for permit unit S-2697-0-3' should be 'permit unit N-2697-0-3'

District Response

Change S-2697-0-3 to N-2697-0-3.

6. VII. Requirements Not Federally Enforceable Page 6 – Please note that Condition 41 for permit -0-3 was also in permit 0-2 as condition 1.

District Response

Changed language to the following:

Condition 41 for permit -0-3, previously condition 1 of -0-2, shows compliance with District Rule 4102 and is not federally enforceable.

7. '...condition 19 of PTO N-2697-1-3..' Page 12 – Please clarify, refers to CEMS conditions, not sulfur. Comment may not be relevant.

District Response

Corrected condition reference to condition 29.

8. 3)a. 'This unit is subject to CAM for VOC emissions..' Page 13 – (also relevant to: "District Response to EPA Comment 2: CAM applicability for VOC") – Please note that NCPA submitted, to the District on 11/5/9, an ATC requesting to: 'Remove condition 34 of Permit Unit N-2697-1-3 Limiting VOC Emissions to 142 lb/day and replace with EPA's AP-42 emission factor for VOC emissions from natural gas-fired turbines (0.0021 lb/MMBtu: Table 3.1-2a). As per the following calculations showing actual uncontrolled emissions are below the major source threshold for VOC, CAM requirements are not applicable to VOC (please note that the District's calculation uses LHV):

$$EF = 0.0021 \text{ lb VOC/MMBtu (AP-42)}$$

$$\text{Throughput} = 463 \text{ MMBtu/hr (HHV-Permit Condition \#22)}$$

$$\text{Pre-Control Emissions} = [EF \times \text{Throughput} \times 24 \text{ hr/day} \times 365 \text{ day/yr}]$$

$$\text{Pre-Control Emissions} = [0.0021 \text{ lb VOC/MMBtu} \times 463 \text{ MMBtu/hr} \times 24 \text{ hr/day} \times 365 \text{ day/yr}] = 8,517 \text{ lb/year} < 50,000 \text{ lb/year}$$

District Response

ATC N-2697-1-6 actually established an annual emission limit of 19,992 lb-VOC/year. The renewal language was changed to the following:

ATC N-2697-1-6 established an annual VOC limit of 19,992 lb-VOC/year, therefore this unit is not subject to CAM for VOC emissions because the major source threshold is not surpassed for controlled VOC emissions.

9. Attachment A & B – NCPA assumes, once approved, the expiration date on the Draft Title V permits will be changed.

District Response

The expiration Date is updated to 05/31/2014.

10. Attachment A &B – The footer on all the PTOs incorrectly locates the facility at 12751 N. Thornton Road. The correct address is 12745 N Thornton Road.

District Response

The location address was updated in our PAS database.

11. Draft PTO N-2697-1-4 Condition 1 – The reference to 40 CFR 60.333(b); Rule 407 (San Joaquin County) should be removed. This reference was not contained in the previous Title V Permit.

District Response

The rule reference are required in order to show compliance with the respective regulations. The condition and references were retained.

12. Draft PTO N-2697-1-4 Condition 20 – The reference to District Rule 4703, 6.2.6 should be removed. This reference was not contained in the previous Title V Permit.

District Response

The rule reference was added to show compliance with the updated District Rule 4703 therefore the reference was retained.

13. Draft PTO N-2697-1-4 Conditions 30-33 dropped 1 significant digit.

District Response

The significant figure was added to all the Daily Emission Limits.

14. Draft PTO N-2697-1-4 – Old permit -1-3 shield conditions # 47, 48, 49 are missing and should be added to Draft Permit -1-4.

District Response

The facility indicated in their original application that they were in compliance with the shield conditions and wanted to have the permit shield conditions retained. The permit shield conditions were added back to the renewal PTO as conditions 59, 60 & 61.

15. Draft PTO N-2697-4-3 Conditions 3 – The reference to District Rules 2201 and 4801 and 17 CCR 93115 should be removed. These references were not contained in the previous Title V Permit.

District Response

The rule reference are required in order to show compliance with the respective regulations. The condition and references were retained.

16. Draft PTO N-2697-4-3 – Old Permit (-4-2) shield condition #9 is missing and should be added to Draft Permit -4-3.

District Response

The facility indicated in their original application that they were in compliance with the shield condition and wanted to have the permit shield condition retained. The permit shield condition was added back to the renewal PTO as condition 8.