



MAY 12 2011

Jim Groff
Ripon Cogeneration, LLC
944 S Stockton Ave
Ripon, CA 95366

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # N-770
Project # N-1094359**

Dear Mr. Groff:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Ripon Cogeneration, LLC for its cogeneration facility at 944 S Stockton Ave, Ripon, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

Attachments

cc: Jagmeet Kahlon, 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
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MAY 12 2011

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

**Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # N-770
Project # N-1094359**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Ripon Cogeneration, LLC for its cogeneration facility at 944 S Stockton Ave, Ripon, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Rupj Gill, Permit Services Manager, at (209) 557-6400.

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MAY 12 2011

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

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # N-770
Project # N-1094359**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Ripon Cogeneration, LLC for its cogeneration facility at 944 S Stockton Ave, Ripon, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services

Attachments
cc: Jagmeet Kahlon, Permit Services Engineer

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Stockton Record

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED RENEWAL OF
THE FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Ripon Cogeneration, LLC for its cogeneration facility at 944 S Stockton Ave, Ripon, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1094359, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CALIFORNIA 95356-8718.

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation
Ripon Cogeneration LLC
N-770**

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TITLE V PERMIT RENEWAL EVALUATION

(Cogeneration Facility)

Engineer: Jagmeet Kahlon
Date: May 2, 2010

Facility Number: N-770
Facility Name: Ripon Cogeneration LLC
Mailing Address: 944 S Stockton Ave
Ripon, CA 95366

Contact Name: Jim Groff
Title: Plant Manager
Phone: (209) 599-2536 ext. 22

Responsible Official: Paulette Heuer
Title: Vice President Operations

Project # : N-1094359
Deemed Complete: November 12, 2009

I. PROPOSAL

Ripon Cogeneration LLC was issued a Title V permit on May 11, 2006. 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 that are updated, removed, or added since the issuance of the previous Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Ripon Cogeneration LLC is located at 944 South Stockton Ave, Ripon, California.

III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

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

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in the Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2020, Exemptions
(amended September 21, 2006 ⇒ amended December 20, 2007)
- District Rule 2201, New and Modified Stationary Source Review Rule
(amended December 18, 2008)
- District Rule 4101, Visible Emissions
(amended February 17, 2005)
- District Rule 4601, Architectural Coatings
(amended October 31, 2001 ⇒ amended December 17, 2009)
- District Rule 4703, Stationary Gas Turbines
(amended August 17, 2006 ⇒ amended September 20, 2007)
- District Rule 8011, General Requirements
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities
(adopted November 15, 2001 ⇒ amended August 19, 2004)

- District Rule 8031, Bulk Materials
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8041, Carryout and Trackout
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8051, Open Areas
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas
(adopted November 15, 2001 ⇒ amended September 16, 2004)
- 40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines
(amended February 24, 2006)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
(amended July 20, 2004)
- 40 CFR Part 68, Chemical Accident Prevention Provisions
(amended April 9, 2004)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners
(amended June 18, 2008)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction
(amended June 18, 2008)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

B. Rules Removed

Rule 8020 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Construction, Demolition, Excavation, and Extraction Activities
(amended November 15, 2001)

Rule 8030 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Handling and Storage of Bulk Materials
(amended November 15, 2001)

Rule 8060 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Paved and Unpaved Roads
(amended November 15, 2001)

C. Rules Added

- 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines
(amended March 2009)

D. Rules Not Updated

- District Rule 1080, Stack Monitoring
(amended December 17, 1992)
- District Rule 1081, Source Sampling
(amended December 16, 1993)
- District Rule 2010, Permits Required
(amended December 17, 1992)
- District Rule 2031, Transfer of Permits
(amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications
(amended December 17, 1992)
- District Rule 2080, Conditional Approval
(amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits
(amended June 21, 2001)
- District Rule 4201, Particulate Matter Concentration
(amended December 17, 1992)
- District Rule 4801, Sulfur Compounds
(amended December 17, 1992)

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements.

The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Added

None

B. Rules Not Updated

- District Rule 1070, Inspections
(amended December 17, 1992)
- District Rule 1100, Equipment Breakdown
(amended December 17, 1992)
- District Rule 1160, Emission Statements
(adopted November 18, 1992)
- District Rule 2040, Applications
(amended December 17, 1992)
- District Rule 4102, Nuisance
(as amended December 17, 1992)

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. Rules Updated

District Rule 2020 Exemptions

District Rule 2020 lists source categories that may be exempt from obtaining permits, and specifies recordkeeping requirements to verify such exemptions. The rule was amended in December 20, 2007. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

Condition 4 of permit N-770-0-3 ensures compliance.

District Rule 2201 New and Modified Stationary Source Review Rule

District Rule 2201 was amended on December 18, 2008, after this facility's Title V permit was last renewed. This Title V permit renewal does not constitute a modification per section 3.25, 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 at this time.

District Rule 4101 Visible Emissions

The provisions of this rule shall apply to any source operation which emits or may emit air contaminants.

Section 5.0 prohibits the discharge into the atmosphere from any single source of emission whatsoever, any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or 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.

Conditions 22 and 39 of permit N-770-0-3 ensure compliance. The date of the rule has been updated to 02/17/05 in these permit conditions.

District Rule 4601 - Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). This rule further specifies labeling requirements, coatings thinning recommendations and storage requirements. See conditions 23, 24, and 25 on facility-wide permit N-770-0-3 which ensure compliance with Rule 4601 requirements.

The latest version of District Rule 4601 has not been SIP approved. Attachment C contains the streamlining of the SIP approved District Rule 4601 (10/31/01) to the current District Rule 4601 to show the current rule is as stringent if not more than the SIP approved version.

District Rule 4703 – Stationary Gas Turbines

The purpose of this rule is to limit NO_x emissions from stationary gas turbine systems. The provisions of this rule apply to all stationary gas turbine systems, which are subject to District permitting requirements, and with ratings equal to or greater than 0.3 megawatt (MW) and/or a maximum heat input rating of more than 3,000,000 Btu per hour, except as provided in Section 4.0.

This facility has a 470 MMBtu/hr GE LM-5000 gas turbine with steam injection and selective catalytic reduction (ammonia injection system). This gas turbine serves a 49.9 MW cogeneration plant. Since the heat input is greater than 3.0 MMBtu/hr, this gas turbine is subject to the requirements of this rule.

Section 5.1.1 specifies the Tier 1 NO_x compliance limits. As discussed below, the stationary gas turbine operates in compliance with the Tier 2 NO_x emission limits specified in Section 5.1.2. The Tier 2 NO_x emission limits are more stringent than the Tier 1 NO_x emissions limits. Therefore, compliance with the Tier 1 NO_x emission limits will be demonstrated with compliance of the Tier 2 NO_x emission limits and no further discussion is required.

Section 5.1.2 specifies the Tier 2 NO_x compliance limits for all stationary gas turbines, and states that the owner or operator of any stationary gas turbine system shall not operate such unit under load conditions, except as allowed by Section 5.3, which results in the measured emissions concentration exceeding the applicable emissions limits shown in Table 5-2 of Rule 4703, according to the Tier 2 Compliance Schedules listed in Section 7.2.

The owner or operator is required to achieve 5 ppmvd NO_x @ 15% O₂ (or less) by April 30, 2004. Condition 9 in permit N-770-3-8 ensures compliance.

Section 5.1.3 specifies Tier 3 NO_x compliance limits, and states that the owner or operator of any stationary gas turbine system listed in Table 5-3 of Rule 4703 shall not operate such unit under load conditions, except as allowed by Section 5.3, which results in the measured emissions concentration exceeding the applicable emission limits in Table 5-3, according to the Tier 3 Compliance Schedule listed in Section 7.3.

Table 5-3: Rule 4703 Tier 3 NO _x Compliance Limits		
Turbine Classification Rating	NO _x limits, ppmvd at 15% O ₂	
	Gas Fuel	Liquid Fuel
a) Less than 3 MW.	9	25
b) 3 MW to 10 MW pipeline gas turbine	8 during steady state and 12 during non-steady state	25
c) 3 MW to 10 MW and permit condition for less than 877 hrs/yr operation and not listed above.	9	25
d) 3 MW to 10 MW and permit condition for 877 hrs/yr operation or greater and not listed above.	5	25
e) Greater than 10 MW, Simple cycle, and permit condition for no greater than 200 hrs/yr operation, except as provided in Section 5.1.3.3.	25	42
f) Greater than 10 MW, Simple cycle, and permit condition for greater than 200 hrs/yr operation but no greater than 877 hrs/yr operation.	5	25

The above table does not include a standard for combined cycle turbines; therefore, this unit is not subject to the Tier 3 NO_x standards at this time.

Section 5.2 requires that the owner or operator of any stationary gas turbine system shall not operate such unit under load conditions, except as allowed by Section 5.3, which results in the measured CO emissions concentration exceeding the compliance limits listed below:

Table 5-4: Rule 4703 Gas Turbine CO Emission Limit	
Stationary Gas Turbine	CO Emission Limit ppmvd @ 15% O ₂
Units not identified below	200
General Electric Frame 7	25
General Electric Frame 7 with Quiet Combustors	52
< 2.0 MW Solar Saturn gas turbine powering a centrifugal compressor	250

This unit is GE's LM-5000, and is required to achieve 200 ppmvd CO @ 15% O₂ (or less). Condition 10 in permit N-770-3-8 ensures compliance with this section.

Section 5.3 requires that on and after the date a unit is required, pursuant to Section 7.0, to be in compliance with the emission limits requirements of Section 5.1 or Section 5.2, the applicable emission limits of Sections 5.1 and 5.2 shall not apply during a transitional operation period (bypass transition period, primary re-ignition period, reduced load period, startup or shutdown) provided an operator complies with the requirements specified below:

- The duration of each startup or each shutdown shall not exceed two hours, except as provided in section 5.3.3 below.
- For each bypass transition period, the requirements specified in Section 3.2 shall be met.
- For each primary re-ignition period, the requirements specified in Section 3.20 shall be met.
- Each reduced load period shall not exceed one hour.
- The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during each transitional operation period.
- An operator may submit an application to allow more than two hours for each startup or each shutdown or more than one hour for each reduced load period provided the operator meets all of the conditions specified in the rule.

The startup and shutdown periods are allowed to be one hour and one-half hour respectively. Conditions 9 and 10 in permit N-770-3-8 ensure compliance with this section.

Section 6.1 states that the owner or operator of any existing stationary gas turbine system shall submit to the APCO an emissions control plan of all actions, including a schedule of increments of progress, which will be taken to comply with the requirements of the applicable NO_x Compliance Limit in Section 5.0 and Compliance Schedule in Section 7.0.

This unit is operating in compliance with the requirements of Rule 4703. There are no additional compliance deadlines for which an emissions control plan is required.

Section 6.2.1 states that 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 (CEMS) for NO_x and oxygen, as identified in Rule 1080 (Stack Monitoring), or install and maintain APCO-approved alternate monitoring.

This facility uses CEMS to measure NO_x, CO, O₂ or CO₂ concentrations from the gas turbine system. Condition 28 in permit N-770-3-8 ensures compliance with this section. A reference to Section 6.2.1 is added in this condition.

Section 6.2.2 requires that except for units subject to Section 6.2.3, for turbines without exhaust-gas NO_x control devices and without continuous emissions monitoring equipment, the owner or operator shall monitor operational characteristics recommended by the turbine manufacturer or emission control system supplier, and approved by the APCO.

This unit is equipped with an SCR system; therefore, this section is not applicable.

Section 6.2.3 applies to units 10 MW and greater that operated an average of more than 4,000 hours per year over the last three years before August 18, 1994, the owner or operator shall monitor the exhaust gas NO_x emissions. The NO_x monitoring system shall meet EPA requirements as specified in 40 CFR Part 60 App. B, Spec. 2, 40 CFR Part 60 App. F, and 40 CFR Part 60.7 (c), 60.7 (d), and 60.13, or other systems that are acceptable to the EPA. The owner or operator shall submit to the APCO information demonstrating that the emission monitoring system has data gathering and retrieval capability.

This facility uses CEMS to measure NO_x, CO, O₂ or CO₂ concentrations from the gas turbine system. CEMS monitors are required to meet 40 CFR Part 60 App. B, Spec. 2 and 3 and 40 CFR Part 60 App. F. This requirement is enforced by condition 34 in permit N-770-3-8. The notification and recordkeeping is required per 40 CFR Part 60.7(c) as specified in condition

44 in permit N-770-3-8. The monitoring requirements in 60.13 are enforced by permit condition 30 in permit N-770-3-8.

Section 6.2.4 requires that the owner or operator shall maintain all records for a period of five years from the date of data entry and shall make such records available to the APCO upon request. Condition 43 in permit N-770-3-8 ensures compliance with this section.

Section 6.2.5 requires that the owner or operator to submit information on correlating the control system operating parameters to the associated measured NO_x output. This information may be used by the APCO to determine compliance when there is no continuous emission monitoring system for NO_x available or when the continuous emission monitoring system is not operating properly. This is a startup requirement for which compliance has already been assured. No additional conditions are required.

Section 6.2.6 requires that the owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used (liquid/gas). Condition 25 in permit N-770-3-8 ensures compliance.

Section 6.2.7 requires that the owner or operator shall maintain a stationary gas turbine system operating log for units exempt under Section 4.2 that includes, on a daily basis, the actual local start-up time and stop time, total hours of operation, and cumulative hours of operation to date for the calendar year. This unit is not exempt under Section 4.2. Therefore, this section is not applicable.

Section 6.2.8 requires that the operator performing start-up or shutdown of a unit shall keep records of the duration of start-up or shutdown. Condition 36 in permit N-770-3-8 ensures compliance with this section. A reference to Section 6.2.8 is added in this condition.

Section 6.2.9 applies to an operation of a unit subject to Section 5.1.3.3 (turbines subject to the provisions of Table 5-3, subsection (e), simple cycle gas turbines). This unit is a cogeneration unit; therefore, this section is not applicable.

Section 6.3.1 requires annual source testing for exhaust gas NO_x and CO concentrations. Condition 17 in permit N-770-3-8 ensures compliance. A reference to Section 6.3.1 is added in this condition.

Section 6.3.2 requires biennial source testing for gas turbine systems operating less than 877 hours per year. The gas turbine system is being operated more than 877 hours per year. Therefore, this section does not apply.

Section 6.3.3 requires that the owner or operator of any unit with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. This unit does not have an auxiliary burner. Therefore, this section does not apply.

Sections 6.4.1 through 6.4.3 require that the following test measures shall be used unless otherwise approved by the APCO and EPA.

- Oxides of nitrogen emissions for compliance tests shall be determined by using EPA Method 7E or EPA Method 20.
- Carbon monoxide emissions for compliance tests shall be determined by using EPA Test Methods 10 or 10B.
- Oxygen content of the exhaust gas shall be determined by using EPA Methods 3, 3A, or 20.

Conditions 17 in permit N-770-3-8 ensures compliance with this section.

Sections 6.4.4 and 6.4.5 list the test methods for determining the HHV and LHV of fuels. Since the permit unit is already in compliance with Tier 2 limits, and HHV or LHV is only required for Tier 1 emission limits, HHV and LHV measurements are not required.

Section 6.5 applies only to exempt and emergency standby units. This unit does not fall under either category. Therefore, this section does not apply.

Section 7.0 lists the compliance schedule for stationary gas turbines. The gas turbine is already in compliance with the Tier 2 NO_x requirements. Tier-3 NO_x standards are not applicable to this unit. Therefore, no further discussion is required.

Section 8.0, has requirements for operators electing to use an Alternative Emission Control Plan (AECPP). This operator has not elected to use an AECPP; therefore, this section does not apply.

District Rule 8011 - General Requirements

The purpose of Regulation VIII (Fugitive PM₁₀ Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM₁₀) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The

provisions of this rule are applicable to specified outdoor fugitive dust sources.

Conditions 29 through 34 of permit N-770-0-3 ensure compliance with the requirements of Rule 8011.

District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities.

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit VDE to 20% opacity.

Compliance with the provisions of this rule is ensured by condition 29 of permit N-770-0-3.

District Rule 8031 - Bulk Materials

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials.

This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit VDE to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011.

Compliance with the provisions of this rule is ensured by condition 30 of permit N-770-0-3.

District Rule 8041 - Carryout and Trackout

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout.

This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that an owner/operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from paved public roads does not exempt an owner/operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

Compliance with the provisions of this rule is ensured by condition 31 of permit N-770-0-3.

District Rule 8051 - Open Areas

The purpose of this rule is to limit fugitive dust emissions from open areas. This rule applies to any open area having 3.0 acres or more of disturbed surface area that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

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

Compliance with the provisions of this rule is ensured by condition 32 of permit N-770-0-3.

District Rule 8061 - Paved and Unpaved Roads

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.

This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

Compliance with the provisions of this rule is ensured by condition 33 of permit N-770-0-3.

District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria.

This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

Compliance with the provisions of this rule is ensured by condition 34 of permit N-770-0-3.

40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines

40 CFR Part 60 Subpart GG applies to all stationary gas turbines with a heat input greater than 10.7 gigajoules per hour (10.2 MMBtu/hr), that commence construction, modification or reconstruction after 10/03/77. This subpart applies to the gas turbine under permit N-770-3.

NO_x requirement from 60.332

Section 60.332(b) requires that electric utility stationary gas turbines with a heat input rate at peak load greater than 100 MMBtu/hr shall comply with the provisions of paragraph (a)(1). Paragraph (a)(1), NO_x emission limit is determined as follows:

$$STD = 0.0075 \frac{(14.4)}{Y} + F ; \text{ where}$$

STD = allowable ISO corrected NO_x emission concentration in % by volume @ 15% O₂ on dry basis

Y = Manufacturer's rated heat rate at manufacturer's rated load (kJ/w-hr) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The Y shall not exceed 14.4 kJ/w-hr.

F = NO_x emission allowance for fuel-bound nitrogen.

The maximum heat input rate to this unit can be 470 MMBtu/hr. At this heat input, the gas turbine is rated to deliver 49.9 MW electric power. This means,

$$Y = (470 \times 10^6 \text{ Btu/hr})(1 \text{ kJ}/0.9478 \text{ Btu})/(49.9 \times 10^6 \text{ w}) \\ = 9.9 \text{ kJ/w-hr}$$

F= 0; for conservative calculations

$$\text{STD} = 0.0075 \frac{(14.4)}{9.9} + 0 = 0.0109 \% \text{ by volume @ } 15\% \text{ O}_2 \text{ (109 ppmv @ } 15\% \text{ O}_2)$$

The unit is required to achieve NO_x emissions of 5 ppmvd @ 15% O₂, which is significantly lower than the NO_x emissions limit of Section 60.332(b). Condition 9 in permit N-770-3-8 ensures compliance.

SO_x requirement from 60.333

Section 60.333 requires every owner or operator to comply with either one of the following:

- (a) prohibits the discharge of any gases, which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis; or
- (b) prohibits burning any fuel which contains total sulfur in excess of 0.8% by weight.

This gas turbine is fired exclusively on natural gas fuel. Condition 45 in permit N-770-3-8 ensures compliance with this section.

Monitoring of Operations from 60.334

Section 60.334(a) requires the owner or operator of any stationary gas turbine subject to the provisions of this subpart and using water or steam injection to control NO_x emissions shall install, calibrate, maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water or steam to fuel being fired in the turbine.

Section 60.334(b) requires the owner/operator of any stationary gas turbine that commenced construction, reconstruction or modification after October 3, 1977, but before July 8, 2004, and which uses water or steam injection to control NO_x emissions may, as an alternate to operate the continuous monitoring system in 60.334(a), install, certify, maintain, operate and quality-assure a CEMS consisting of NO_x, and CO₂ or O₂ monitors.

This gas turbine system was originally permitted on June 23, 1987. The system is equipped with steam injection and SCR system to reduce NO_x emissions. NO_x, CO and O₂ concentrations from the turbine system are monitored using CEMS. Conditions 28, 33, and 34 in permit N-770-3-8 ensure compliance with this section.

Section 60.334(c) allows the use of previously approved NO_x monitoring systems for units that do not use steam or water injection to control NO_x emissions. The gas turbine uses steam injection. Therefore, this section is not applicable.

Section 60.334(d, e, and f) contain requirements for gas turbines that commenced construction after July 8, 2004. These requirements are not applicable because this gas turbine commenced construction prior to July 8, 2004.

Section 60.334(h) requires monitoring of sulfur content and nitrogen content of the fuel being fired in the turbine. The owner or operator does not claim an allowance for fuel bound nitrogen; therefore, fuel nitrogen content testing is not required. Fuel sulfur content is required to be documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract, or monitored weekly for 8 consecutive weeks, and then at least once every six months if the sulfur content is found to be less than 1.0 gr/100 scf in 8 consecutive week tests. Condition 41 in permit N-770-3-8 ensures compliance with this section.

Section 60.334(i) has the frequency of determining sulfur and nitrogen content of the fuel. The owner or operator does not claim an allowance for fuel bound nitrogen; therefore, fuel nitrogen content testing is not discussed. Sulfur content in the fuel is assured by condition 41 in the proposed permit N-770-3-8.

Section 60.334(j) requires the owner/operator to submit reports of excess emissions and monitor downtime, in accordance with §60.7(c), for all periods including startup, shutdown, and malfunction. Condition 44 in the proposed permit N-770-3-8 enforces the requirements of this section. This condition requires submittal of excess emissions report on a semi-annual basis, and be postmarked by the 30th day following the end of each calendar quarter rather than the 30th day following the end of each six-month period. This condition is revised to stay consistent with the language in section §60.7(c). This does not constitute a relaxation since the District requires (via Rule 1080) the owner/operator to submit written reports of excess emissions on a quarterly basis (see condition 37 in the proposed permit N-770-3-8).

Test Methods and Procedures from 60.335

Section 60.335(a) states that the owner or operator shall conduct performance tests required in 60.8 using either EPA Method 20, ASTM D6522-00 or EPA Method 7E and either EPA Method 3 or 3A. Condition 17 is revised to include ASTM D6522 in the proposed permit N-770-3-8.

Section 60.335(b) states that the owner or operator shall determine compliance with the applicable NO_x emission limit, and shall meet the performance test requirements of 60.8 following the application sections from 60.335(b)(1) to (b)(11).

Section 60.335(b)(1) requires that for each run of the performance test, the mean nitrogen oxide emission concentration @ 15% O₂ shall be corrected to ISO standard conditions using the equation listed in this section to demonstrate compliance with NSPS NO_x standard. NO_x correction to ISO standard is optional for the units equipped with add-on emissions control devices. The gas turbine is equipped with an SCR system. Therefore, NO_x correction to ISO standard conditions is not required in the permit.

Section 60.335(b)(1) states that the 3-run performance test must be performed within +/-5% at 30, 50, 75, and 90-to-100 percent of peak load or at four evenly-spaced load points in the normal operating range of the gas turbine, including the minimum point in the operating range and 90-to-100 percent of peak load, or at the highest achievable load point if 90-to-100 percent of peak load cannot be physically achieved in practice. Two examples from "Applicability Determination Index" (ADI) with control # 0300115, 0500009 shows that EPA had waived multi-load testing for the units that burn natural gas and are equipped with CEMS. Therefore, this permit does not require multi-load testing for the gas turbine.

Section 60.335(b)(3) states that for a combined cycle turbine system with duct burner, the owner may elect to measure turbine NO_x emissions after the duct burner rather than directly after turbine. The gas turbine is not equipped with a duct burner. Therefore, this section is not applicable to this turbine.

Section 60.335(b)(4) states that if water or steam injection is used to control NO_x with no additional post-combustion NO_x control and the owner or operator chooses to monitor the steam or water to fuel ratio then that monitoring system must be operated with each performance test run to determine the fuel consumption and the steam or water to fuel ratio to demonstrate on-going compliance with the NO_x standard. The gas turbine is equipped with an SCR system (post-combustion NO_x control). Furthermore, the exhaust stack is equipped with CEMS. Therefore, this section is not applicable to this turbine.

Section 60.335 states that if the owner elects to claim an emission allowance for fuel bound nitrogen, then concurrently with each reference method run, a representative sample of the fuel used shall be collected and analyzed following the applicable procedure described in §60.335(b)(9). These data shall be used to determine the maximum fuel nitrogen content for which the established water or steam to fuel ratio will be valid.

Per <http://www.naturalgas.org/overview/background.asp>, nitrogen content in a natural gas varies between 0-5 percent. There would not be any significant variation in the NO_x emission limit if the permittee was given an allowance for fuel bound nitrogen. Furthermore, the NO_x emissions of 5 ppmvd @ 15% O₂ accounts for the fuel bound nitrogen. Given that this limit is more stringent than that of the NSPS NO_x emission limit, allowance for fuel bound nitrogen is not considered for the fuel used in gas turbine in this project.

Section 60.335(b)(6) states that if the owner or operator elects to install a CEMS, the performance evaluation of CEMS may either be conducted separately or as part of the initial performance test of the affected unit as described in paragraph (b)(7). The owner or operator is not electing to install a CEMS as part of this project; rather, they already measure NO_x, CO and O₂ concentrations using CEMS monitors. The performance evaluation of CEMS (relative accuracy audits, i.e., RAA are conducted separately and RATA at the time of each performance test). Therefore, no separate condition is necessary to enforce the requirements of this section.

Section 60.335(b)(7) states that if the owner or operator elects to install and certify a NO_x CEMS under 60.334(e), then the initial performance test required under 60.8 may be done in the alternative manner listed in 60.335(b)(7)(i) to 60.335(b)(7)(i). The owner or operator is not electing to install a CEMS as part of this project; rather, they already measure NO_x, CO and O₂ concentrations using CEMS monitors. Furthermore, section 60.334(e) applies to new turbine that commences construction after July 8, 2004. Therefore, no separate condition is necessary to enforce the requirements of this section.

Section 60.335(b)(8) states if the owner or operator elects under section 60.334(f) to monitor combustion parameters or parameter indicative of proper operation of NO_x emission controls, the appropriate parameters shall be continuously monitored and recorded during each run of the initial performance test. The gas turbine had commenced construction before the cut-off date (July 8, 2004) mentioned in 60.334(f). Therefore, no separate condition is necessary to enforce the requirements of this section.

Section 60.335(b)(9) states methods and procedures for determining fuel bound nitrogen. NO_x limit in the permit is more stringent than the NSPS limit. Therefore, no separate condition is necessary to enforce the requirements of this section.

Section 60.335(b)(10) states if the owner or operator is required to determine the sulfur content of the fuel combusted in the turbine then a minimum of three fuel samples shall be collected during the performance test. The turbine is exclusively fired on natural gas with sulfur content less than 0.00398% by weight. The sulfur content in the fuel is significantly less than the sulfur content allowed under this subpart. No separate condition is necessary to enforce the requirements of this section. Moreover, condition 41 in permit N-770-3-8 ensures compliance with the fuel sulfur content.

Section 60.335(c)(1) states the owner or operator may use alternatives to the 60.335(b)(1) by developing ambient condition correction factors to adjust measured NO_x level to ISO standard dry conditions. NO_x correction to ISO standard is optional for the units equipped with add-on emissions control devices. The gas turbine is equipped with an SCR system. Therefore, NO_x correction to ISO standard is not required in the proposed permit.

40 CFR Part 61, Subpart M, National Emissions Standards for Asbestos

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.156 of this Subpart was amended on July 20, 2004. However, the amendments to this section do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

Compliance with the provisions of this rule is ensured by condition 35 of permit N-770-0-3.

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

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in condition 28 of permit N-770-0-3.

40 CFR Part 82, Subpart F, Recycling and Emissions Reduction

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in condition 27 of permit N-770-0-3.

40 CFR Part 64 – Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires 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), SCR system, baghouses, and thermal/catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

N-770-3-8: 470 MMBTU/HR GENERAL ELECTRIC LM-5000 NATURAL GAS FIRED TURBINE WITH STEAM INJECTION AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION SERVING A 49.9 MW COGENERATION PLANT

This permit unit contains a limit for NO_x and is equipped with an SCR system. The unit is already equipped with CEMS that continuously monitor and record NO_x, CO and O₂ concentrations. Therefore, this unit is exempt from CAM requirements.

The permit also contains limits for SO_x, PM₁₀, CO and VOC. There is no add-on emission control device used to reduce these emissions. Therefore, this unit is not subject to CAM for these pollutants.

B. Rules Removed

Rule 8020 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Construction, Demolition, Excavation, and Extraction Activities
(amended November 15, 2001)

Rule 8030 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Handling and Storage of Bulk Materials
(amended November 15, 2001)

Rule 8060 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Paved and Unpaved Roads
(amended November 15, 2001)

These rules have been removed and replaced with Rule 8021, 8031, and 8061. The requirements of the new rules (Rule 8021, 8031, and 8061) are mentioned in conditions 29, 30 and 33 in the proposed permit N-770-0-3.

C. Rules Added

40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines

The requirements of this subpart apply to a stationary combustion turbine with heat input (at peak load) equal to or greater than 10 MMBtu/hr, and that commenced construction, modification or reconstruction after February 18, 2005. This subpart regulates nitrogen oxide (NO_x) and sulfur dioxide (SO_x) emissions only.

The gas turbine under permit N-770-3 has not been constructed, modified or reconstructed after February 18, 2005. Thus, this unit is not subject to this subpart at this time.

D. Rules Not Updated

- District Rule 1080, Stack Monitoring
(amended December 17, 1992)
- District Rule 1081, Source Sampling
(amended December 16, 1993)
- District Rule 2010, Permits Required
(amended December 17, 1992)
- District Rule 2031, Transfer of Permits
(amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications
(amended December 17, 1992)
- District Rule 2080, Conditional Approval
(amended December 17, 1992)

- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)

These rules are not discussed in this evaluation as these rules are not amended, except as provided below.

District Rule 2520, Federally Mandated Operating Permits

There are no federally applicable GHG requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant is not proposing to use any model general permit templates. Therefore, no further discussion is necessary.

B. Requirements not Addressed by Model General Permit Templates

The applicant is not proposing to use any model general permit templates. Therefore, no further discussion is necessary.

C. New Permit Shields

Ripon Cogeneration LLC requests permit shields for three categories of regulatory requirements:

1. Permit shield for all federally enforceable applicable requirements, which has been identified in Title V permit application and which have been specifically incorporated as permit conditions into the Title V permit.

2. Permit shield for all non-federally enforceable requirements identified in the Title V permit application and which have been incorporated into the permit either as general obligations or as facility-specific, SJVUAPCD-only requirements.
3. Permit shield from all regulatory requirements listed in the permit application that ultimately is not included in the Title V permit because the SJVUAPCD has determined that they do not apply to this facility (N-770). It does not seem logically correct to shield the source from non-applicable requirements. Therefore, no shields are established for this category.

The following permit shields have established as part of this project:

N-770-0-3

39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1100, Section 6.1 (12/17/92); 2010 section 3.0 (12/17/92); 2070 section 7.0 (12/17/92); 4101 (02/17/05); 4601 Sections 5.1, 5.4, 6.1 and 6.3 (12/17/09). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

N-770-3-8

26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1080 Sections 4.0, 6.3, 6.4, 6.5, 6.6, 7.1, 7.3, 8.0, 9.0, 10.0, 11.0 (12/17/92); 1081 Sections 3.0, 6.0, 7.1 and 7.2 (12/16/93); 4201, Section 3.0 (12/17/92); 4703 Sections 5.1, 5.1.2, 5.2, 6.2.3, 6.2.4, 6.2.6, 6.2.8, 6.4.1, 6.4.2, and 6.4.3 (9/20/07); 4801 (12/17/92); 40 CFR 60.332(a)(1) (7/8/04), 60.333(b) (7/8/04), 60.334(b) (2/24/06), 60.334(j)(1)(iii) (2/24/06), 60.334(j)(5) (2/24/06), and 60.335(a) (2/24/06). A permit shield is granted from these requirements. [District Rule 2520, 13.2]
27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: San Joaquin County Rules 108, 404, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

D. Obsolete/Old Permit Shields From Existing Permit Requirements

N-770-0-2

The following permit condition has been removed and replaced with the condition in section IX.C (above).

39. Compliance with permit conditions in the Title V permit shall be deemed 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 (12/17/92); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (12/17/92); 8020 (4/25/96); 8030 (4/25/96); 8060 (4/25/96). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

N-770-3-6

The following permit conditions have been removed and replaced with the conditions in section IX.C (above).

26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: 40 CFR 60.332(a) & (b); 60.333 (a) & (b); San Joaquin County Rules 404 & 108; SJVUAPCD Rule 4703, Section 6.2.2. A permit shield is granted from these requirements. [District Rule 2520, 13.2]
27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4801, 4201, 1081 and 1080, Sections 4.0, 6.5, 7.2, 7.3, 8.0, 9.0, and 10.0; San Joaquin County Rule 407; 60.334(b); and 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit

XI. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Stringency Comparison for District Rule 4601
- D. Detailed Facility List

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-770-0-3

EXPIRATION DATE: 04/30/2010

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] 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] 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. [District Rules 2010, 3.0 & 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 (Permits Required) 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 5) 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
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

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: RIPON COGENERATION LLC
Location: 944 S STOCKTON AVE, RIPON, CA 95366
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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. [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, 9.8.1] 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, 9.8] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05), by using EPA method 9. 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] Federally Enforceable Through Title V Permit
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 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] 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. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [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 (8/19/04) or Rule 8011 (8/19/04). [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 (8/19/04) or Rule 8011 (8/19/04). [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 (8/19/04) or Rule 8011 (8/19/04). [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 (8/19/04) or Rule 8011 (8/19/04). [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 (9/16/04) or Rule 8011 (8/19/04). [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
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

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 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 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 compliance with the following applicable requirements: SJVUAPCD Rules 1100, Section 6.1 (12/17/92); 2010 section 3.0 (12/17/92); 2070 section 7.0 (12/17/92); 4101 (02/17/05); 4601 Sections 5.1, 5.4, 6.1 and 6.3 (12/17/09). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. The facility shall comply with all applicable requirements regarding preparation and implementation of a risk management plan by June 21, 1999 and shall abide by all applicable sections of 40 CFR Part 68. [40 CFR 68] 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 begin 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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-770-3-8

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

470 MMBTU/HR GENERAL ELECTRIC LM-5000 NATURAL GAS FIRED TURBINE WITH STEAM INJECTION AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION SERVING A 49.9 MW COGENERATION PLANT

PERMIT UNIT REQUIREMENTS

1. The turbine shall be designed and operated at STIG (trademark GE). [District NSR Rule] Federally Enforceable Through Title V Permit
2. A minimum of 45,000 lb/hr of steam at 650 PSIG and 550 degrees F shall be available for injection into the combustion section of the turbine for NOx control, except during start-up and shut-down. [District NSR Rule] Federally Enforceable Through Title V Permit
3. A selective catalytic reduction (SCR) system shall be installed in the path of the heat recovery boiler where the temperature range is 575 degrees F to 750 degrees F. [District NSR Rule] Federally Enforceable Through Title V Permit
4. 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
5. There shall be no visible emissions (except for uncombined water) from the entire system. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Ammonia shall be injected into the combustion gases at a ratio determined by source testing to reduce the NOx emission concentration to 5 ppm, dry at 15% oxygen, except for start-up periods of one hour duration and shutdown periods of one-half hour. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The ammonia slip shall not exceed 20 ppmv, dry at 15% oxygen. [District Rule 4102]
8. Operator shall not discharge into the atmosphere combustion contaminants (PM) exceeding 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
9. The NOx emissions shall not exceed 5 ppmv dry @ 15% O2 over a one hour averaging period except for start-up periods of one hour duration and shutdown periods of one-half hour duration. [40 CFR60.332(a)(1) and District Rule 4703, 5.1.2] Federally Enforceable Through Title V Permit
10. The CO emissions shall not exceed 200 ppmv dry @ 15% O2 over a one hour averaging period except for start-up periods of one hour duration and shutdown periods of one-half hour duration [District Rule 4703, 5.2] Federally Enforceable Through Title V Permit
11. The NOx emission rate shall not exceed 250 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The CO emission rate shall not exceed 1,302 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The VOC emission concentration shall not exceed 0.0133 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The SO_x emission concentration shall not exceed 0.0029 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The PM₁₀ emission concentration shall not exceed 0.0088 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The daily emission rate shall be calculated by multiplying the hourly emission rate by the number of operating hours. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Performance testing for NO_x and CO emissions shall be conducted annually using EPA Methods 7E or 20, or ASTM D6522 for NO_x and EPA Methods 10 or 10B for CO. Oxygen content of the exhaust gas shall be measured by EPA Methods 3, 3A, or 20. [District Rules 4703, 6.3.1, 6.4.1, 6.4.2, 6.4.3 and 2520, 9.3.2; 40 CFR 60.335(a)] Federally Enforceable Through Title V Permit
18. The stack height shall be a minimum of 71 feet and shall be adequate for stack sampling pursuant to EPA reference methods for source testing and shall meet all the requirements of District Rule 1081. [District Rule 1081, 3.2] Federally Enforceable Through Title V Permit
19. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
20. Performance testing shall be witnessed or authorized District personnel. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit
21. If the turbine is fired on PUC-regulated natural gas, the operator shall maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. Any emissions in excess of the limits imposed by conditions in this permit, as measured by the continuous monitoring equipment constitutes a violation of District Rules and Regulations and shall be reported by the operator to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
23. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEMS. The operator shall inform the District of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
24. Operator shall maintain a daily log indicating the hourly ammonia injection rate. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. 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 Rules 4703, 6.2.6; and 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1080 Sections 4.0, 6.3, 6.4, 6.5, 6.6, 7.1, 7.3, 8.0, 9.0, 10.0, 11.0 (12/17/92); 1081 Sections 3.0, 6.0, 7.1 and 7.2 (12/16/93); 4201, Section 3.0 (12/17/92); 4703 Sections 5.1, 5.1.2, 5.2, 6.2.3, 6.2.4, 6.2.6, 6.2.8, 6.4.1, 6.4.2, and 6.4.3 (9/20/07); 4801 (12/17/92); 40 CFR 60.332(a)(1) (7/8/04), 60.333(b) (7/8/04), 60.334(b) (2/24/06), 60.334(j)(1)(iii) (2/24/06), 60.334(j)(5) (2/24/06), and 60.335(a) (2/24/06). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: San Joaquin County Rules 108, 404, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
28. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x, CO, O₂ or CO₂ concentrations. [40 CFR 64; 40 CFR 60.334(b); District Rules 4703, 6.2.1, 6.2.3, and 1080, 4.0] 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.

29. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
30. Results of the CEMS shall be averaged in accordance with all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1 and 6.2.3] Federally Enforceable Through Title V Permit
31. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
32. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F, 5.1.1, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [40 CFR 64 and District Rule 1080] Federally Enforceable Through Title V Permit
33. During each full unit operating hour, the CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour, to validate the hour. For partial unit operating hours, at least one valid data point must be obtained for each quadrant of the hour in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one in each of two quadrants) are required to validate the hour. [40 CFR 64; 40 CFR 60.334(b)(2); District Rule 1080, 6.4] Federally Enforceable Through Title V Permit
34. The NO_x, CO, 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 64; 40 CFR 60.334(b)(1); District Rules 1080, 6.3, 6.5, and 6.6, and 4703, 6.2.3] Federally Enforceable Through Title V Permit
35. The CEMS shall be linked to a data logger which is compatible with the District's Data acquisition system. Upon notice by the District that the facility's CEMS is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
36. 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 64; 40 CFR 60.7(b); District Rules 1080, 7.3, and 4703, 6.2.8] Federally Enforceable Through Title V Permit
37. The owner or operator shall submit a written report of CEMS operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO_x and CO emissions, nature and the 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 CEMS was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
38. Excess emissions shall be defined as any operating hour in which 4-hour rolling average NO_x or CO 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, CO or O₂. [40 CFR 64 and 40 CFR 60.334(j)(1)(iii)] 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.

39. 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] Federally Enforceable Through Title V Permit
40. This unit shall be fired exclusively on natural gas with sulfur content of less than 0.00398% by weight. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
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 D1072, 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 an exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3) and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
42. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
43. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [40 CFR 64, District Rule 2520, 9.3.2 and 4703, 6.2.4] Federally Enforceable Through Title V Permit
44. The owner or operator shall submit reports of excess emissions and monitor downtime, in accordance with 40 CFR 60.7(c) on a semi annual basis. Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined in 40 CFR 60.334(j). All reports required under 40 CFR 60.7(c) shall be postmarked by the 30th day following the end of each six-month period. [40 CFR 60.334(j); 40 CFR 60.334 (j)(5); District Rule 4703, 6.2.3] Federally Enforceable Through Title V Permit
45. The unit shall be fired exclusively on natural gas as defined in 40 CFR 60.331(u) which has a total sulfur content of 20.0 gr/100 scf or less (equivalent to 0.068% by weight). [40 CFR 60.333(b)] Federally Enforceable Through Title V Permit

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

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ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-770-0-2

EXPIRATION DATE: 04/30/2010

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] 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] 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. [District Rule 2010, 3.0 & 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 (Permits Required) 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 5) 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
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

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: RIPON COGENERATION LLC
Location: 944 S STOCKTON AVE, RIPON, CA 95366
N-770-0-2 : Jan 24 2011 2:24PM - KAHLOUJ

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. [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, 9.8.1] 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, 9.8] 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), by using EPA method 9. 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] Federally Enforceable Through Title V Permit
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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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 Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (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
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

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 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 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 (12/17/92); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (12/17/92); 8020 (4/25/96); 8030 (4/25/96); 8060 (4/25/96). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. The facility shall comply with all applicable requirements regarding preparation and implementation of a risk management plan by June 21, 1999 and shall abide by all applicable sections of 40 CFR Part 68. [40 CFR 68] 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 begin 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-770-3-6

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

470 MMBTU/HR GENERAL ELECTRIC LM-5000 NATURAL GAS FIRED TURBINE WITH STEAM INJECTION AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION SERVING A 49.9 MW COGENERATION PLANT

PERMIT UNIT REQUIREMENTS

1. The turbine shall be designed and operated at STIG (trademark GE). [District NSR Rule] Federally Enforceable Through Title V Permit
2. A minimum of 45,000 lb/hr of steam at 650 PSIG and 550 degrees F shall be available for injection into the combustion section of the turbine for NOx control, except during start-up and shut-down. [District NSR Rule] Federally Enforceable Through Title V Permit
3. A selective catalytic reduction (SCR) system shall be installed in the path of the heat recovery boiler where the temperature range is 575 degrees F to 750 degrees F. [District NSR Rule] Federally Enforceable Through Title V Permit
4. 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
5. There shall be no visible emissions (except for uncombined water) from the entire system. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Ammonia shall be injected into the combustion gases at a ratio determined by source testing to reduce the NOx emission concentration to 5 ppm, dry at 15% oxygen, except for start-up periods of one hour duration and shutdown periods of one-half hour. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The ammonia slip shall not exceed 20 ppmv, dry at 15% oxygen. [District Rule 4102]
8. Operator shall not discharge into the atmosphere combustion contaminants (PM) exceeding 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
9. The NOx emissions shall not exceed 5 ppmv dry @ 15% O2 over a one hour averaging period except for start-up periods of one hour duration and shutdown periods of one-half hour duration. [40 CFR60.332(a)(1), (a)(2), and District Rule 4703, 5.1.2] Federally Enforceable Through Title V Permit
10. The CO emissions shall not exceed 200 ppmv dry @ 15% O2 over a one hour averaging period except for start-up periods of one hour duration and shutdown periods of one-half hour duration [District Rule 4703, 5.2] Federally Enforceable Through Title V Permit
11. The NOx emission rate shall not exceed 250 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The CO emission rate shall not exceed 1,302 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The VOC emission concentration shall not exceed 0.0133 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The SO_x emission concentration shall not exceed 0.0029 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The PM₁₀ emission concentration shall not exceed 0.0088 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The daily emission rate shall be calculated by multiplying the hourly emission rate by the number of operating hours. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Performance testing for NO_x and CO emissions shall be conducted annually using EPA Methods 7E or 20 for NO_x and EPA Methods 10 or 10B for CO. Oxygen content of the exhaust gas shall be measured by EPA Methods 3, 3A, or 20. [District Rule 4703, 6.3.1 & 6.4, and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. The stack height shall be a minimum of 71 feet and shall be adequate for stack sampling pursuant to EPA reference methods for source testing and shall meet all the requirements of District Rule 1081. [District Rule 1081, 3.2] Federally Enforceable Through Title V Permit
19. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
20. Performance testing shall be witnessed or authorized District personnel. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit
21. If the turbine is fired on PUC-regulated natural gas, the operator shall maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. Any emissions in excess of the limits imposed by conditions in this permit, as measured by the continuous monitoring equipment constitutes a violation of District Rules and Regulations and shall be reported by the operator to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
23. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the District 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
24. Operator shall maintain a daily log indicating the hourly ammonia injection rate. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. 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, 6.2.4 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: 40 CFR 60.332(a) & (b); 60.333 (a) & (b); San Joaquin County Rules 404 & 108; SJVUAPCD Rule 4703, Section 6.2.2. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4801, 4201, 1081 and 1080, Sections 4.0, 6.5, 7.2, 7.3, 8.0, 9.0, and 10.0; San Joaquin County Rule 407; 60.334(b); and 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
28. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x, CO, O₂ or CO₂ concentrations. [40 CFR 64, 40 CFR 60.334(b), District Rule 4703, 6.2.3, and 1080, 4.0] Federally Enforceable Through Title V Permit
29. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. Results of the CEM system shall be averaged in accordance with all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
31. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
32. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F, 5.11, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [40 CFR 64 and District Rule 1080] Federally Enforceable Through Title V Permit
33. During each full unit operating hour, the CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour, to validate the hour. For partial unit operating hours, at least one valid data point must be obtained for each quadrant of the hour in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one in each of two quadrants) are required to validate the hour. [40 CFR 64, 40 CFR 60.334(b)(2) and District Rule 1080, 6.4] Federally Enforceable Through Title V Permit
34. The NO_x, CO, 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 64, 40 CFR 60.334(b)(1) and, District Rule 1080, 6.3, 6.5, 6.6, & 7.2] Federally Enforceable Through Title V Permit
35. The CEMS shall be linked to a data logger which is compatible with the District's Data acquisition system. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
36. 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 64, 40 CFR 60.7(b) and District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
37. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO_x and CO emissions, nature and the 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. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
38. Excess emissions shall be defined as any operating hour in which 4-hour rolling average NO_x or CO 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, CO or O₂. [40 CFR 64, 40 CFR 60.334(J)(1)(iii)] Federally Enforceable Through Title V Permit
39. 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] Federally Enforceable Through Title V Permit
40. This unit shall be fired exclusively on natural gas with sulfur content of less than to 0.00398% by weight. [District NSR Rule and District Rule 4201] 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.

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 an exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3) and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
42. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
43. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [40 CFR 64, District Rule 2520, 9.3.2 and 4703, 6.2.4] Federally Enforceable Through Title V Permit
44. The owner or operator shall submit reports of excess emissions and monitor downtime, in accordance with §60.7(c) on a semi annual basis. Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under §60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined in 40CFR60.334(j). All reports required under §60.7(c) shall be postmarked by the 30th day following the end of each calendar quarter. [40 CFR 60.334(j), and 40CFR60.334 (j)(5)] Federally Enforceable Through Title V Permit
45. The unit shall be fired exclusively on natural gas as defined in 40 CFR 60.331(u) which has a total sulfur content of 20.0 gr/100 scf or less (equivalent to 0.068% by weight). [40 CFR 60.333(b)] 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-770-7-8

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

94 MMBTU/HR HOLMAN BOILER MODEL #WT9609-1004 GP WITH A NATCOM ULTRA LOW NOX HYPER-MIX BURNER AND A FLUE GAS RECIRCULATION SYSTEM (LOAD-FOLLOWING BOILER). *** THIS IS A DORMANT EMISSION UNIT.***

PERMIT UNIT REQUIREMENTS

1. No modifications to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
2. The fuel supply line shall be physically disconnected from this unit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
3. The fuel flow meter reading shall not exceed 1097036 cubic feet. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
4. This boiler shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4320 and all other applicable District regulations. [District Rule 4320] Federally Enforceable Through Title V Permit
5. The boiler's testing and monitoring requirements shall not be applicable during the time period the boiler is designated as a dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
8. Particulate matter emissions from any combustion source shall not exceed 0.1 grains/dscf (calculated to 12% CO₂). [District Rules 4201, 3.0; and 4301, 5.1] Federally Enforceable Through Title V Permit
9. The boiler shall be fired only on natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The NO_x emissions concentration shall not exceed 15 ppmv, dry, corrected to 3% oxygen (O₂) or 0.018 pounds per MMBtu. [District NSR Rule, District Rule 4305, 5.1.1, and 4306, 5.1.1] Federally Enforceable Through Title V Permit
11. The CO emissions concentration shall not exceed 280 ppmv, dry, corrected to 3% oxygen (O₂). [District NSR Rule, District Rule 4305, 5.1.1, and 4306, 5.1.1] Federally Enforceable Through Title V Permit
12. The VOC emissions rate shall not exceed 0.0055 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
13. The PM₁₀ emissions rate shall not exceed 0.0076 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
14. The SO_x emissions rate shall not exceed 0.00285 lb/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. Performance testing for NO_x and CO emissions shall be conducted annually using the following test methods: EPA Method 7E (or ARB Method 100) for NO_x (ppmv), EPA Method 10 (or ARB Method 100) for CO, EPA Method 3 or 3A (or ARB Method 100) for stack gas oxygen, EPA Method 2 for stack gas velocity, and EPA Method 4 for stack gas moisture content. [District Rules 4305, 6.2 & 6.3; 4306, 6.2 & 6.3; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. The unit may be tested once every 36 months, if the performance testing shows compliance for two consecutive years. If a performance test shows noncompliance with any of the requirements, the source shall return to annual performance testing until compliance is again shown for two consecutive years. [District Rules 4305, 6.3; 4306, 6.3; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. The stack height shall be adequate for stack sampling pursuant to EPA reference methods for performance testing and shall meet all the requirements of District Rule 1081. [District Rule 1081, 3.2] Federally Enforceable Through Title V Permit
18. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
19. Performance testing shall be witnessed or authorized by District personnel. Test results must be submitted to the District within 60 day of performance testing. [District Rules 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit
20. If the boiler is fired on PUC-regulated natural gas, then the operator shall maintain copies of natural gas bills. [District Rule 2520, 9.4.2 and 40 CFR 60.40c - 48c] Federally Enforceable Through Title V Permit
21. If the boiler is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the boiler shall be calculated using ASTM method D 1072, D 3031, D 4084 or D 3246. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. If the boiler is not fired on PUC-regulated natural gas, then the sulfur content of each fuel source shall be less than 0.0062% by weight, tested weekly except that if the fuel sulfur content requirement has been met for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a quarterly test does not meet the sulfur content requirement, the source must return to weekly testing until eight consecutive weekly tests meet the sulfur content requirement. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. The stack concentration of NO_x (as NO₂), CO, and O₂ shall be measured and recorded at least on a monthly basis using an ECOM Model AC portable emission analyzer, or other District approved portable emission analyzer. [District Rules 4305; 4306, 5.4; and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of the date and time of NO_x, CO, and O₂ measurements, the measured NO₂ and CO concentrations corrected to 3% O₂, and the O₂ concentration. The records must also include a description of any corrective action taken to maintain the emissions within the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made available for District inspection upon request. [District Rules 4305; 4306, 5.4; and 2520, 9.5.2] Federally Enforceable Through Title V Permit
25. If the NO_x or CO concentrations, as measured by the ECOM Model AC, or other District approved portable emissions analyzer, exceed the allowable emissions rate, the permittee shall notify the District and take corrective action within one hour after detection. If the portable analyzer readings continue to exceed the allowable emissions rate, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emissions limits. [District Rules 4305; 4306, 5.4; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. The portable emissions analyzer shall be calibrated as recommended by the manufacturer. All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 6 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305; 4306, 5.4; and 2520, 9.4.2] Federally Enforceable Through Title V Permit
27. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rules 4305, 2520, 9.4.2, and 4306, 5.4] 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.

28. If water vapor is not removed prior to measurement, the absolute humidity in the gas stream must be determined so that the gas concentrations may be reported on a dry basis. [District Rules 4305 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
29. If water vapor creates an interference with the measurement of any component, then the water vapor must be removed from the gas stream prior to concentration measurements. [District Rules 4305 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
30. The source test plan shall identify which basis (ppmvd or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5] Federally Enforceable Through Title V Permit
31. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2; and 4306, 5.5.2] Federally Enforceable Through Title V Permit
32. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.5.4; and 4306, 5.5.4] Federally Enforceable Through Title V Permit
33. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5; and 4306, 5.5.5] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit
35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rules 4201, 4301, & 4801. 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

Stringency Comparison for District Rule 4601

Stringency Comparison of District Rule 4601 Non-SIP Version (12/17/09) to Current SIP Version (10/31/01)

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
2.0 Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures any architectural coating for use within the District.	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	No change in the applicability, therefore, non-SIP version of rule is as stringent as SIP version.
4.0 Exemptions	<p>The provisions of this rule shall not apply to:</p> <p>4.1 Any architectural coating that is sold or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.2 Any architectural coating that is sold in containers with a volume of one liter (1.057 quarts) or less.</p> <p>4.3 Any aerosol coating product.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	The only change is to require reporting requirements as discussed in Section 6.2 of the non-SIP approved version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
6.0 Requirements	Note: Section 5.0 requirements refer to Table of Standards, Table of Standards 1, and Table of Standards 2. These tables are included as Attachment X.		
	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2, 5.3, 5.8 and 8.0, no person shall;</p> <p>5.1.1 manufacture, blend, or repackage for sale within the District;</p> <p>5.1.2 supply, sell, or offer for sale within the district;</p> <p>5.1.3 solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards, after the specified effective date in the Table of Standards.</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	Sections 5.8 and 8.0 of the SIP version are not included in the non-SIP version. As discussed in corresponding sections the non-SIP version is more stringent. The Table of Standards and Table of Standards 1 have the same VOC limits. Table of Standard 2 is more stringent as discussed below. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	<p>5.2 Most Restrictive VOC Limit: If anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in the Table of Standards, then the most restrictive VOC content limit shall apply. This provision does not apply to the following coating categories:</p> <p>5.2.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.2 Metallic pigmented coatings</p> <p>5.2.3 Shellacs</p> <p>5.2.4 Fire-retardant coatings</p> <p>5.2.5 Pretreatment wash primers</p> <p>5.2.6 Industrial maintenance coatings</p> <p>5.2.7 Low-solids coatings</p>	<p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the</p>	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>5.2.8 Wood preservatives 5.2.9 High temperature coatings 5.2.10 Temperature-indicator safety coatings 5.2.11 Antenna coatings 5.2.12 Antifouling coatings 5.2.13 Flow coatings 5.2.14 Bituminous roof primers 5.2.15 Specialty primers, sealers and undercoaters</p>	<p>specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers) 5.2.3.2 Metallic pigmented coatings 5.2.3.3 Shellacs 5.2.3.4 Fire-retardant coatings 5.2.3.5 Pretreatment wash primers 5.2.3.6 Industrial maintenance coatings 5.2.3.7 Low-solids coatings 5.2.3.8 Wood preservatives 5.2.3.9 High temperature coatings 5.2.3.10 Temperature-indicator safety coatings 5.2.3.11 Antenna coatings 5.2.3.12 Antifouling coatings 5.2.3.13 Flow coatings 5.2.3.14 Bituminous roof primers 5.2.3.15 Specialty primers, sealers and undercoaters 5.2.3.16 Aluminum roof coatings 5.2.3.17 Zinc-rich primers 5.2.3.18 Wood Coatings</p>	
	<p>5.3 Sell-Through of Coatings: 5.3.1 A coating manufactured prior to the January 1, 2003 or January 1, 2004 effective date specified for that coating in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1. 5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the</p>	<p>5.3 Sell-Through of Coatings: A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Section 5.3.2 was removed it is no longer applicable in the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Table of Standards may be sold, supplied, or offered for sale for up to three years after the end of the compliance period specified in the approved Averaging Program. In addition, such a coating may be applied at any time, both during and after the compliance period. This Section 5.3.2 does not apply to any coating that does not display on the container either the statement: "This product is subject to architectural coatings averaging provisions in California" or a substitute symbol specified by the Executive Officer of the California Air Resources Board (ARB). This Section 5.3.2 shall remain in effect until January 1, 2008.</p>		
	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</p>
	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards.</p>	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.6 Rust Preventative Coatings: Effective January 1, 2004, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards.</p>	<p>5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.7 Coatings Not Listed in the Table of Standards: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss, as defined in Sections 3.21, 3.36 and 3.37 and the corresponding flat or nonflat VOC limit shall apply.</p>	<p>5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.8 Lacquers: Notwithstanding the provisions of Section 3.1, a person or facility may add up to 10 percent by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater</p>	<p>---</p>	<p>This section has been removed. The operation is required to meet the lacquer VOC limit regardless of</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	than 70 percent and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.		temperature and humidity. Therefore, non-SIP version of rule is as stringent as SIP version
	5.9 Averaging Compliance Option: On or after January 1, 2003, in lieu of compliance with the specified limits in The Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; bituminous roof coatings; rust preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in Section 8.0, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section 5.9 and Section 8.0 shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.	---	This section is removed from the non-SIP version, it is no longer applicable. Therefore, non-SIP version of rule is as stringent as SIP version.
	---	5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.	Table of Standards 2 is more stringent than the VOC limits of Table of Standards in the SIP-Approved version. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements	Table of Standards (See Attachment X for Table)	Table of Standards 1 (Effective through 12/31/10) (See Attachment X for Table)	The non-SIP rule requirements are the same as the Table of Standards in the SIP approved rule, except Table of Standards 1 expires at which time Table of Standards 2 is in effect. As discussed below these standards are more stringent. Therefore, non-SIP version of rule is as stringent as SIP version.
		Table of Standards 2 (Effective on and after 1/1/11) (See Attachment X for Table)	The requirements of Table of Standards 2 are more stringent than the Table of Standards in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the	The non-SIP approved rule contain sections listed in the SIP rule plus

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section</p> <p>6.3.1. The equations in Sections 3.25 or 3.26, as appropriate, shall be used to calculate VOC content.</p> <p>6.1.4 Industrial Maintenance Coatings: In addition to the information specified in Sections 6.1.1, 6.1.2 and 6.1.3, each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.4.1 through 6.1.4.3.</p> <p>6.1.4.1 "For industrial use only"</p> <p>6.1.4.2 "For professional use only"</p> <p>6.1.4.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.5 Clear Brushing Lacquers: Effective January 1, 2003, the labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed."</p> <p>6.1.6 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only"</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: Effective January 1, 2003, the labels of all specialty primers, sealers and undercoaters shall prominently</p>	<p>information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of</p>	<p>additional requirements not found in the SIP version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>display one or more of the descriptions listed in Section 6.1.7.1 through 6.1.7.5.</p> <p>6.1.7.1 For blocking stains.</p> <p>6.1.7.2 For fire-damaged substrates.</p> <p>6.1.7.3 For smoke-damaged substrates.</p> <p>6.1.7.4 For water-damaged substrates.</p> <p>6.1.7.5 For excessively chalky substrates.</p> <p>6.1.8 Quick Dry Enamels: Effective January 1, 2003, the labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time.</p> <p>6.1.9 Non-flat – High Gloss Coatings: Effective January 1, 2003, the labels of all non-flat – high gloss coatings shall prominently display the words "High Gloss".</p>	<p>the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words "High Gloss."</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 "For industrial use only"</p> <p>6.1.14.2 "For professional use only"</p> <p>6.1.14.3 "Not for residential use" or "Not intended for residential use"</p>	
	<p>6.2 Reporting Requirements</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p>	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an</p>	<p>Until December 31, 2010 both versions of the rule have the same reporting requirements. After that date the non-SIP approved rule includes very specific information to be kept and is required for all architectural coatings. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p>	<p>annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2. to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17,</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <p>6.2.7.1 the name and mailing address of the manufacturer;</p> <p>6.2.7.2 the name, address and telephone number of a contact person;</p> <p>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.7.4 whether the product is marketed for interior or exterior use or both;</p> <p>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.7.7 the names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.7.10 description of resin or binder in the product;</p> <p>6.2.7.11 whether the coating is a single-component or multi-component product;</p> <p>6.2.7.12 the density of the product in pounds per gallon;</p> <p>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p data-bbox="358 352 516 373">6.3 Test Methods</p> <p data-bbox="391 394 776 1171">6.3.1 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.26 and 3.27, the reference method for VOC content is U.S. EPA Method 24, except as provided in Sections 6.3.2 and 6.3.15. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Section 6.3.14. The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised August 1996), incorporated by reference in Section 6.3.12. To determine the VOC content of a coating, the manufacturer may use U.S. EPA Method 24, or an alternative method as provided in Section 6.3.2, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.2. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct a Method 24 analysis.</p> <p data-bbox="391 1178 776 1640">6.3.2 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.1, after review and approved in writing by the staffs of the District, the ARB and the U.S. EPA, may also be used. 6.3.3 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. EPA Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section 6.3.15. This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p data-bbox="391 1646 776 1814">6.3.4 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM Designation E 84-99, "Standard Test Method for Surface Burning Characteristics of Building Materials"(see Section 3, Fire-Retardant Coating).</p> <p data-bbox="391 1820 776 1845">6.3.5 Fire Resistance Rating: The fire</p>	<p data-bbox="797 352 954 373">6.3 Test Methods</p> <p data-bbox="829 394 1198 531">The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p data-bbox="813 552 1198 1171">6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p data-bbox="813 1178 1198 1845">6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24</p>	<p data-bbox="1219 352 1442 531">The non-SIP version includes all the requirements of the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>resistance rating of a fire-resistive coating shall be determined by ASTM Designation E 119-98, "Standard Test Methods for Fire Tests of Building Construction Materials"(see Section 3, Fire-Resistive Coating).</p> <p>6.3.6 Gloss Determination: The gloss of a coating shall be determined by ASTM Designation D 523-89 (1999), "Standard Test Method for Specular Gloss"(see Section 3, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.7 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, SCAQMD Laboratory Methods of Analysis for Enforcement Samples (see Section 3, Metallic Pigmented Coating).</p> <p>6.3.8 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM Designation D 1613-98, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products"(see Section 3, Pre-Treatment Wash Primer).</p> <p>6.3.9 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM Designation D 1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quickdry enamel coating shall be determined by the Mechanical Test Method of ASTM Designation D 1640-95.</p> <p>6.3.10 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM Designation D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specially Primer, Sealer and Undercoater).</p> <p>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," BAAQMD Manual of Procedures, Volume III, adopted 11/6/98 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.12 Exempt Compounds—</p>	<p>test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 4, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, SCAQMD Laboratory Methods of Analysis for Enforcement Samples (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-08, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," BAAQMD Manual of Procedures, Volume III, adopted 12/20/95 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.13 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," SCAQMD Laboratory Methods of Analysis for Enforcement Samples (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by U.S. EPA Method 24 as it exists in appendix A of 40 Code of Federal Regulations (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings"(see Section 6.3.1).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," SCAQMD Laboratory Methods of Analysis for Enforcement Samples (see Section 6.3.1).</p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998) (see Section 6.3.3).</p>	<p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," BAAQMD Manual of Procedures, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," BAAQMD Manual of Procedures, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," SCAQMD Laboratory Methods of Analysis for Enforcement Samples (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 Code of</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p><i>Federal Regulations (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</i></p> <p>6.3.16 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples.</i></p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p> <p>6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	
7.0 Compliance Schedule	Persons subject to this rule shall be in compliance with this rule by October 31, 2001.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
8.0 Averaging Compliance Option	8.1 On or after January 1, 2003, in lieu of compliance with the specified limits in the Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; rust		No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in this Section, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p> <p>Per Section 8.1, averaging is no longer applicable. Therefore, Section 8.2 through 8.14 are not listed.</p>		

District Rule 4601 was amended (12/17/2009). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.

ATTACHMENT D

Detailed Facility List

SJVUAPCD
NORTHERN

Detailed Facility Report
For Facility=770
Sorted by Facility Name and Permit Number

5/2/11
5:05 pm

RIPON COGENERATION LLC 944 S STOCKTON AVE RIPON CA 95366	FAC # STATUS TELEPHONE:	N 770 A 7134291359	TYPE: TOXIC ID:	Title V 21150	EXPIRE ON AREA INSP DATE:	04/30/2010 9/ 12/11
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-770-1-0	60,085,000 BTU/HR	3020-02 H	1	1,030.00	1,030.00	D	ONE 60.1 MMBTU/HR WICKES BOILER
N-770-3-6	49,900 KW	3020-08A G	1	10,215.00	10,215.00	A	470 MMBTU/HR GENERAL ELECTRIC LM-5000 NATURAL GAS FIRED TURBINE WITH STEAM INJECTION AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION SERVING A 49.9 MW COGENERATION PLANT
N-770-4-0	ELECTRIC GENERATION	999-99	1	0.00	0.00	D	MODIFICATION OF AP88-40 SCR CATALYST
N-770-7-8	94 MMBtu/hr boiler	3020-02 H	1	1,030.00	1,030.00	D	94 MMBTU/HR HOLMAN BOILER MODEL #WT9609-1004 GP WITH A NATCOM ULTRA LOW NOX HYPER-MIX BURNER AND A FLUE GAS RECIRCULATION SYSTEM (LOAD-FOLLOWING BOILER). *** THIS IS A DORMANT EMISSION UNIT.***

Number of Facilities Reported: 1