



AUG 02 2011

Mark Strehlow  
Pacific Gas & Electric Co  
Attn: Air Quality Permits  
PO Box 7640  
San Francisco, CA 94120

**RE: Notice of Final Action - Authority to Construct  
Project Number: C-1111924**

Dear Mr. Strehlow:

The Air Pollution Control Officer has issued Authority to Construct permits to Pacific Gas & Electric Co for a temporary 2,722 bhp Tier 2 certified diesel-fired full-time use IC engine, at Helms Office Complex-Woodchuck, Shaver Lake. Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

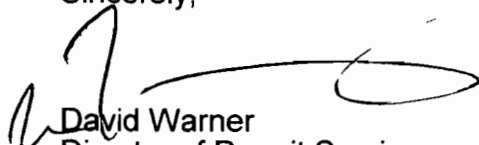
Notice of the District's preliminary decision to issue this Authority to Construct was published on July 2, 2011. The District's analysis of the proposal was also sent to CARB on June 30, 2011. All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in referenced PE2 and SSPE2 values being revised to match the calculated values. These changes were minor and did not trigger additional public notification requirements, nor did they have any impact upon the Best Available Control Technology determination or on the amount of offsets required for project approval.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

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

Sincerely,



David Warner  
Director of Permit Services

DW:jag

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

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

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



AUG 02 2011

Mike Tollstrup, Chief  
Project Assessment Branch  
Stationary Source Division  
California Air Resources Board  
PO Box 2815  
Sacramento, CA 95812-2815

**RE: Notice of Final Action - Authority to Construct**  
**Project Number: C-1111924**

Dear Mr. Tollstrup:

Thank you for your comments on the above project. Enclosed are your comments summarized and the District's specific responses to your comments.

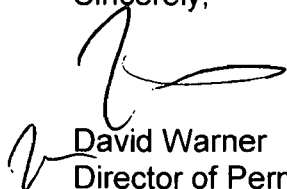
The Air Pollution Control Officer has issued Authority to Construct permits to Pacific Gas & Electric Co for a temporary 2,722 bhp Tier 2 certified diesel-fired full-time use IC engine, at Helms Office Complex-Woodchuck, Shaver Lake.

Also enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

We trust that the enclosed responses satisfy your concerns and appreciate your concurrence on this project. On the other hand, if you disagree with the District's position, we would appreciate your prompt response detailing your concerns.

If you have any questions, regarding the above response, or require additional clarification, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

DW: JAG

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Fresno Bee

**NOTICE OF FINAL ACTION  
FOR THE ISSUANCE OF AUTHORITY  
TO CONSTRUCT PERMITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Authority to Construct permits to Pacific Gas & Electric Co for a temporary 2,722 bhp Tier 2 certified diesel-fired full-time use IC engine, at Helms Office Complex-Woodchuck, Shaver Lake.

All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in referenced PE2 and SSPE2 values being revised to match the calculated values. These changes were minor and did not trigger additional public notification requirements, nor did they have any impact upon the Best Available Control Technology determination or on the amount of offsets required for project approval.

The application review for Project #C-1111924 is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**

CARB's Comments and District's Responses:

Comment: The emission factor listed on the ATC (3.76 g-NOx/bhp-hr) is higher than was listed in the evaluation (3.75 g-NOx/bhp-hr)

The emission factor on the ATC was corrected to the lower limit of 3.75 g-NOx/bhp-hr.

Comment: The PE > 100 lb/day Public Notice Thresholds table listed an different daily PE2 for NOx than what was listed in the Project Emissions table on page 4

The daily PE2 in the PE > 100 lb/day Public Notice Thresholds table was corrected to match the emissions calculated in the Project Emissions table on page 4.

Comment: The SSPE2 emissions (except for NOx) listed in the Offset Threshold table are different than SSPE2 that was calculated on page 5

The SSPE2 emissions listed in the Offset Threshold table were corrected to match the SSPE2 calculated on page 5.

Comment: Condition 3210 (test methods) is not listed on the ATC

Condition 3210 was removed as it was incorrectly placed in the evaluation. Condition 3210 (test methods) and source testing is not required to demonstrate compliance with District Rule 4702 as the engine is a Tier certified engine.

Comment: Fuel consumption limit in the RMR is different than the ATC and what was used in the PE calculations

What was submitted for the RMR was the initial proposal which was later revised. The RMR was performed with the initial proposed fuel limit, which was higher than the revised limit, as a worst case scenario.

Comment: The QNEC table in Attachment V appears to be using the incorrect values for the calculation

The QNEC calculations were revised using the PE2 values calculated in Section VII.C.2.



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-3197-3-1

**ISSUANCE DATE:** 08/01/2011

**LEGAL OWNER OR OPERATOR:** PACIFIC GAS & ELECTRIC CO  
**MAILING ADDRESS:** ATTN: AIR QUALITY PERMITS  
PO BOX 7640  
SAN FRANCISCO, CA 94120

**LOCATION:** HELMS OFFICE COMPLEX-WOODCHUCK  
SHAVER LAKE, CA 93664

**EQUIPMENT DESCRIPTION:**  
TEMPORARY 2,722 BHP CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR

## CONDITIONS

1. This Authority to Construct (ATC) cancels and supersedes ATC C-3197-3-0. [District Rule 2201]
2. An Authority to Construct (ATC) application shall be submitted on or before July 1, 2014 or 12 years from the installation of the engine, whichever is later, to be in compliance with Rule 4702. [District Rule 4702]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. 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]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93116]
7. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
8. The engine shall be equipped with an operational nonresettable elapsed fuel meter or other APCO approved alternative. [District Rule 4702]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
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DAVID WARNER, Director of Permit Services  
C-3197-3-1 : Aug 1 2011 7:40AM - GARCIAJ Joint Inspection NOT Required

9. This transportable nonroad engine shall not be operated at one location for more than 12 consecutive months and shall meet all the requirements of a transportable nonroad engine, per CFR Title 40 Part 89. [CCR, Title 17 and District Rule 4701]
10. Operation of the engine shall not exceed 110,855 gallons of fuel used per calendar year, as determined by an operational nonresettable elapsed operating fuel meter or other APCO approved alternative. [District Rules 2201, 4102 and 4702 and 17 CCR 93116]
11. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
12. Emissions from the IC engine shall not exceed any of the following limits: 3.75 g-NOx/bhp-hr, 0.90 g-CO/bhp-hr, or 0.20 g-VOC/bhp-hr. [District Rule 2201]
13. The PM10 emissions rate from the engine shall not exceed 0.08 g/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93116]
14. During periods of operation, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
15. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total gallons of fuel used, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702]
16. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702]