



OCT 27 2011

Clint Cooper  
Covanta Delano, Inc  
P O Box 550  
Delano, CA 93216

**Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # S-75  
Project # S-1071550**

Dear Mr. Cooper:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Covanta Delano, Inc for its Biomass Power Plant located at 31500 Pond Road in Delano, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Attachments

C: Gurpreet Brar, Permit Services Engineer

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

---

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

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

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



**San Joaquin Valley**  
**AIR POLLUTION CONTROL DISTRICT**

**OCT 27 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 # S-75  
Project # S-1071550**

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 Covanta Delano, Inc for its Biomass Power Plant located at 31500 Pond Road in Delano, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Attachments

C: Gurpreet Brar, Permit Services Engineer

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

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**San Joaquin Valley**  
**AIR POLLUTION CONTROL DISTRICT**

**OCT 27 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 # S-75  
Project # S-1071550**

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 Covanta Delano, Inc for its Biomass Power Plant located at 31500 Pond Road in Delano, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", with a long horizontal flourish extending to the right.

David Warner  
Director of Permit Services

**Attachments**

C: Gurpreet Brar, Permit Services Engineer

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

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Bakersfield Californian

**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 Covanta Delano, Inc for its Biomass Power Plant located at 31500 Pond Road in Delano, California.

The District's analysis of the legal and factual basis for this proposed action, project #S-1071550, 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 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. Jim Swaney, Permit Services Manager, at (559) 230-5900. 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, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation  
Covanta Delano, Inc.  
S-75

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Biomass Power Plant**

**Engineer:** Gurpreet Brar  
**Date:** October 24, 2011

**Facility Number:** S-75  
**Facility Name:** Covanta Delano, Inc.  
**Mailing Address:** P O Box 550 (31500 Pond Road)  
Delano, CA 93216

**Contact Name:** Mike G. Norton P.E.  
**Phone:** (661) 792-3067 ext. 111

**Responsible Official:** Mike G. Norton P.E.  
**Title:** Plant Manager

**Project # :** S-1071550  
**Deemed Complete:** April 12, 2007

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**I. PROPOSAL**

Covanta Delano, Inc. was issued a Title V permit on December 31, 2002. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

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.

Covanta Delano, Inc. has proposed Title V minor permit modifications with the Title V permit renewal application to streamline conditions, correct minor errors and to remove certain conditions that are not applicable or appropriate for the permits to operate. The District's response to the changes proposed by facility in Compliance Plan is included as Attachment F.

## **II. FACILITY LOCATION**

Covanta Delano, Inc. is located at 31500 Pond Road and Highway 99 in Delano, CA.

## **III. EQUIPMENT LISTING**

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

## **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 this current Title V permit will be subject to EPA and public review.

## **VI. FEDERALLY ENFORCEABLE REQUIREMENTS**

### **A. Rules Updated**

- District Rule 2020, Exemptions  
(amended December 19, 2002 ⇒ amended August 18, 2011)
- District Rule 2201, New and Modified Stationary Source Review Rule  
(amended December 18, 2008 ⇒ amended April 21, 2011)

- District Rule 4101, Visible Emissions  
(amended November 15, 2001 ⇒ amended February 17, 2005)
- District Rule 4352, Solid Fuel Fired Boilers, Steam Generators, and Process Heaters  
(amended October 19, 1995 ⇒ amended May 18, 2006)
- District Rule 4601, Architectural Coatings  
(amended October 31, 2001 ⇒ amended December 17, 2009)
- 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 Db, Standards of Performance for Industrial Commercial - Institutional Steam Generating Units
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos



- 40 CFR Part 68, Chemical Accident Prevention Provisions, (amended April 9, 2004)
- 40 CFR Part 82, Subpart B, Stratospheric Ozone, (amended November 9, 2007)
- 40 CFR Part 82, Subpart F, Stratospheric Ozone, (amended June 8, 2008)

#### **B. Rules Removed**

- District Rule 4701, Internal Combustion Engines – Phase 1 (amended August 21, 2003)

Pursuant to Section 7.5.2.3 of District Rule 4702, District Rule 4701 is no longer applicable to emergency IC engines and these engines will only comply with the requirements of District Rule 4702.

#### **C. Rules Added**

- District Rule 4702, Internal Combustion Engines – Phase II (amended August 18, 2011)  
*\* August 18, 2011 revision not SIP-approved, but applicable requirements identical to SIP-approved January 18, 2007 revision\**
- 40 CFR Part 63, Subpart ZZZZ- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- 40 CFR 64, Compliance Assurance Monitoring

#### **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 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001 )
- District Rule 4001, New Source Performance Standards (amended April 14, 1999)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4801, Sulfur Compounds (Non-SIP replacement for Kern County Rule 108.1) (amended December 17, 1992)
- 40 CFR Part 52.21, Prevention of Significant Deterioration (PSD)

## 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:

- District Rule 1100, Equipment Breakdown (as amended December 17, 1992)
- District Rule 1160, Emission Statements (as adopted November 18, 1992)
- District Rule 2040, Applications (as 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. District Rule 2020 - Exemptions

District Rule 2020 lists equipments which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

### B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.24.1, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.

- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

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

### **C. District Rule 2520, Federally Mandated Operating Permits**

Section 13.2 provides that compliance with permit conditions in part 70 permits that expressly state that a permit shield exists shall be deemed compliance with the applicable requirements on which the permit conditions are based.

#### **S-75-0-2: FACILITY-WIDE REQUIREMENTS**

Condition 5, 8 through 21, 26 and 36 through 39 on the facility-wide permit ensure compliance with the requirements of this rule.

There are no federally applicable Greenhouse Gas (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.

### **D. District Rule 4101 - Visible Emissions**

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

- Condition 22 on facility wide permit S-75-0-2 assures compliance with the requirements of this rule.
- Condition 15 on permit S-75-6-25 & S-75-11-21 will ensure compliance with the requirements of this rule.

**E. District Rule 4352 - Solid Fuel Fired Boilers, Steam Generators, and Process Heaters**

This rule limits the emissions of oxides of nitrogen (NOx) and carbon monoxide (CO) from solid fuel fired boilers, steam generators and process heaters.

Section 5.1 states that the owner/operator of a boiler, steam generator or process heater shall not operate such a unit in a manner that results in NOx and CO emissions exceeding the limits specified in Table 1. The emission limits measured in parts per million by volume (ppmv) are referenced at dry stack gas conditions and shall be corrected to the applicable percent O<sub>2</sub> or CO<sub>2</sub> specified in Table 1 in accordance with EPA Method 19.

**Table 1 - NOx and CO Emission Limits**

Fuel Type	Tier 2 Emission Limits	
	NOx Limit	CO Limit
<b>Municipal Solid Waste</b>	200 ppmv corrected to 12% CO <sub>2</sub>	400 ppmv corrected to 3% O <sub>2</sub>
<b>Biomass using Multiple Hearth Furnace</b>	115 ppmv corrected to 3% O <sub>2</sub>	
<b>All Others</b>	115 ppmv corrected to 3% O <sub>2</sub>	

Section 5.3 states that the applicable emission limits of Section 5.1 shall not apply during start-up or shutdown provided an operator complies with the requirements specified below:

- Section 5.3.1 requires that the duration of each shut down shall not exceed twelve (12) hours, except as provided in Section 5.3.4
- Section 5.3.2 requires that the duration of each start-up shall not exceed 96 hours, except as provided in Section 5.3.4. If curing of the refractory is required after a modification to the unit is made, the duration of start-up shall not exceed 192 hours, except as provided in Section 5.3.4.
- Section 5.3.3 requires that the emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown.

Section 5.5 states that the owner/operator of any unit using ammonia injection as a NOx control technique, shall operate a Continuous Emissions Monitoring system (CEM) to monitor and record NOx concentrations, CO2 or O2 concentrations, as well as the NOx emission rate. Continuous Emission Monitoring systems shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7 (c) and 60.13. CEMs must also satisfy the Performance Specifications of 40 CFR 60 Appendix B and the Relative Accuracy Test Audit of Appendix F.

Section 6.2 states that the owner/operator of any unit subject to the requirements of this rule shall maintain, on a monthly basis, an operating log for each unit that includes the following information:

- type and quantity of fuel used
- the higher heating value (hhv) of each fuel as determined by Section 6.4, or as certified by a third party fuel supplier

Section 6.3.1 requires that each unit subject to the requirements of this rule shall be tested at least once every twelve (12) months, to determine compliance with the applicable requirements of Section 5.0.

Section 6.3.2 states that all emission measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate.

Section 6.3.3 states that the compliance determination shall not be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer.

Section 6.4.1 states that compliance with the requirements of Section 5.0 shall be determined in accordance with the following source test procedures unless otherwise approved by the APCO, ARB, and EPA:

- 6.4.1.1 Oxides of nitrogen (ppmv) – EPA Method 7E, or ARB Method 100.
- 6.4.1.2 Carbon monoxide (ppmv) - EPA Method 10, or ARB Method 100.
- 6.4.1.3 Stack gas oxygen - EPA Method 3 or 3A, or ARB Method 100.
- 6.4.1.4 NOx emission rate (Heat input basis) - EPA Method 19.
- 6.4.1.5 Stack gas velocities - EPA Method 2.
- 6.4.1.6 Stack gas moisture content - EPA Method 4.
- 6.4.1.7 Solid fuel higher heating value (hhv) - ASTM Method D 2015-96, or
- 6.4.1.8 Solid fuel higher heating value (hhv) - ASTM Method E 711-87.
- 6.4.1.9 ASTM D 1826-94 or D 1945-96 in conjunction with ASTM D 3588-98 for gaseous fuels

**S-75-6-25:**

- Condition 25, 32, 34, 36, 40, 41, 65, 88, 89 & 90 on the draft permit S-75-6-25 will ensure compliance with the requirements of this rule.

**S-75-11-21:**

- Condition 23, 30, 32, 34, 38, 39, 62, 90, 91 & 92 on the draft permit S-75-11-21 will ensure compliance with the requirements of this rule.

**F. District Rule 4601 – Architectural Coatings**

This rule limits the emissions of VOC's 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. The rule was amended in February 17, 2005 but had not been SIP approved. The stringency analysis in Attachment D shows that the amended rule is as stringent as the SIP approved version of the rule that was adopted in October 31, 2001.

The following changes were included in the latest rule amendment that resulted in revising current permit requirements:

- The tables outlining the VOC content of different specialty coatings has been largely replaced with the Table of Standards in Section 5.0.
- New labeling, reporting, test methodology and other requirements have been incorporated into the rule in order to allow ARB to administer the Averaging Program as detailed in Section 8.0.
- Conditions 23, 24 and 25 of the facility wide requirements S-75-0-2 will assure compliance with the requirements of this rule.

### **G. District Rule 4702 - Internal Combustion Engines – Phase II**

This analysis is based on the latest revision (August 18, 2011) which has not been SIP approved. However, this rule only impacts the emergency IC engine at this facility, and these requirements are identical to the latest SIP approved revision (January 18, 2007). The only change is Section 5.7 has been moved to Section 5.9. Therefore, compliance with this revision ensures compliance with the SIP approved January 18, 2007 revision. No further stringency analysis is required.

The purpose of District rule 4702 is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines.

This rule applies to any internal combustion engine rated at 25 brake horsepower or greater.

Section 3.15 defines an "Emergency Standby Engine" as an internal combustion engine which operates as a temporary replacement for primary mechanical or electrical power during an unscheduled outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the operator. An engine shall be considered to be an emergency standby engine if it is used only for the following purposes: (1) periodic maintenance, periodic readiness testing, or readiness testing during and after repair work; (2) unscheduled outages, or to supply power while maintenance is performed or repairs are made to the primary power supply; and (3) if it is limited to operate 100 hours or less per calendar year for non-emergency purposes. An engine shall not be considered to be an emergency standby engine if it is used: (1) to reduce the demand for electrical power when normal electrical power line service has not failed, or (2) to produce power for the utility electrical distribution system, or (3) in conjunction with a voluntary utility demand reduction program or interruptible power contract.

Pursuant to Section 4.2, except for the requirements of Sections 5.9 and 6.2.3, the requirements of this rule shall not apply to an emergency standby engine or a low-use engine, provided that the engine is operated with an operating nonresettable elapsed time meter.

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



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

Section 5.9 requires that the owner of an emergency standby engine that is subject to section 4.2 shall comply with the requirements specified in Section 5.9.2 through Section 5.9.4 of this rule:

- 1) Properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier.
- 2) Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.
- 3) Install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate or Stationary Equipment Registration condition. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

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

The records shall include, but are not limited to, the following:

- 6.2.3.1 Total hours of operation,
- 6.2.3.2 The type of fuel used,
- 6.2.3.3 The purpose for operating the engine,
- 6.2.3.4 For emergency standby engines, all hours of non-emergency and emergency operation shall be reported, and
- 6.2.3.5 Other support documentation necessary to demonstrate claim to the exemption

**S-75-16-2:**

The emergency standby IC engine serving fire water pump involved with this project will only have to meet the requirements of Section 6.2.3 of this Rule.

- Condition 1, 4, 7, 8 & 9 on the draft PTO S-75-16-2 will assure compliance with the requirements of District Rule 4702.

**S-75-17-2 & S-75-18-2:**

The emergency standby IC engine involved with this project will only have to meet the requirements of Sections 5.7 and 6.2.3 of this Rule.

- Condition 1, 4, 7 thru 11 on the draft PTO S-75-17-2 and S-75-18-2 will assure compliance with the requirements of District Rule 4702.

**H. District Rule 8011, General Requirements**

The purpose of Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM<sub>10</sub>) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The Rules contained in this Regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM<sub>10</sub> Nonattainment Areas. These rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM<sub>10</sub> and particles larger than PM<sub>10</sub>. Controlling fugitive dust emissions when visible emissions are detected will not prevent all PM<sub>10</sub> emissions, but will substantially reduce PM<sub>10</sub> emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in this rule are applicable to all Rules under Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

- Conditions 29 through 34 of the facility-wide requirements S-75-0-2 will ensure compliance with these requirements.

**I. 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. This rule also applies to the construction of new landfill disposal sites or modification to existing landfill disposal sites prior to commencement of landfilling activities.

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. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

- Condition 29 of the facility-wide requirements S-75-0-2 will ensure compliance with these requirements.

**J. 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. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

- Condition 30 of the facility-wide requirements S-75-0-2 will ensure compliance with these requirements.

#### **K. 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. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII. 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.

- Condition 31 of the facility-wide requirements S-75-0-2 will ensure compliance with these requirements.

**L. 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.

- Condition 32 of the facility-wide requirements S-75-0-2 will ensure compliance with these requirements.

**M. 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.

- Condition 33 of the facility-wide requirements S-75-0-2 will ensure compliance with these requirements.

**N. 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.

- Condition 34 of the facility-wide requirements S-75-0-2 will ensure compliance with these requirements.

**O. 40 CFR Part 60 Subpart Db—Standard of Performance for Industrial-Commercial-Institutional Steam Generating Units**

Subpart Db applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 MMBtu/hr.

This subpart was amended in January 28, 2009 to add compliance alternatives for owners/operators of certain affected sources, to eliminate the opacity standard for certain facilities voluntarily using PM CEMS, and to correct technical and editorial errors.

- Condition 11, 12, 21 & 86 on the proposed PTO S-75-6-25 will assure compliance with the applicable requirements of this subpart.
- Condition 11, 12, 20 & 89 on the proposed PTO S-75-11-21 will assure compliance with the applicable requirements of this subpart.

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

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.150 of this Subpart was amended September 18, 2003, and condition 35 of S-75-0-2 assures compliance with the requirements.

**Q. 40 CFR Part 63 Subpart ZZZZ**

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§6585(b) states, "A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site."

§6585(c) states, "An area source of HAP emissions is a source that is not a major source."

The facility is not a major source as defined in §6585(b). Therefore, this facility is an area source of HAP emissions.

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

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

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

This facility is an area source of HAP emissions. The engines at this facility are greater than 500 hp and have commenced construction or reconstruction before December 19, 2002. Therefore, each of the engine meet the definition of an existing stationary RICE as defined in §6590(a)(1)(iii).

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

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

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

#### **R. 40 CFR Part 64, Compliance Assurance Monitoring**

This regulation requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

1. the unit must have emission limit for the pollutant;
2. the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
3. the unit must have a pre-control potential to emit of greater than a major source threshold

<b>Pollutant</b>	<b>Major Source Threshold (lb/year)</b>
VOC	20,000
NO <sub>x</sub>	20,000
CO	200,000
PM <sub>10</sub>	140,000
SO <sub>x</sub>	140,000



S-75-1-7:

1. This unit contains emission limits for PM<sub>10</sub> only.
2. This unit has dust collectors as add-on control for PM<sub>10</sub> emissions.
3. Typically the District assumes that a dust collector will achieve 99% control for PM<sub>10</sub> emissions. Therefore, the uncontrolled emission rates can be determined using the emission limit on the current permit and the control efficiency of the dust collector.

Controlled PE for PM<sub>10</sub> emissions is calculated as given below:

Emissions from these units consist of emissions from baghouses (fabric collectors) BH-2 (truck dump), BH-3 (stacker reclaimer), and BH-4 (primary screen and hog) and storage pile wind erosion.

BH-3 and BH-4 are shared with S-75-5.

BH-2: (40,000 scf/min)(0.0045 gr/scf)(24 hr/day)(60 min/hr)/7000 gr/lb	= 37.03 lb/day
BH-3: (20,000 scfm/min)(0.004 gr/scf)(24 hr/day)(60 min/hr)/7000 gr/lb	= 16.46 lb/day
BH-4: (30,000 scf/min)(0.004 gr/scf)(24 hr/day)(60 min/hr)/7000 gr/lb	= 24.69 lb/day
storage pile wind erosion = 1.32 lb PM10/hr x 24 hr/day	= 31.73 lb/day
<b>Total</b>	<b>= 109.9 lb/day,</b>

Annual Uncontrolled PE = [109.9 lb/year x 365 days/year] / [1 – 0.99]  
= 4,011,350 lb/year

Since this exceeds the PM<sub>10</sub> major source threshold of 140,000 lb/year, CAM is applicable to this unit for PM<sub>10</sub>.

Annual Controlled PE = 109.9 lb/year x 365 days/year  
= 40,114 lb/year

Since the post-control annual emissions do not exceed the Major Source threshold for PM<sub>10</sub> of 140,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM.

CAM compliance requires a daily visible emissions inspection in conjunction with daily monitoring of the pressure differential gauge and is satisfied by monitoring and recordkeeping of differential operating pressure of dust collectors on each day of operation.

- Condition 22, 23, 48, 51, 52, 53 & 54 on the proposed PTO S-75-1-7 will assure compliance with the applicable requirements of this subpart

S-75-3-6 & -4-6:

1. These units contain emission limits for PM<sub>10</sub> only.
2. These units have fabric filters as add-on control for PM<sub>10</sub> emissions.
3. The uncontrolled emission rates can be determined using the emission limit on the current permit of 0.024 lb/ton, throughput of 25 tons/day and 99% control efficiency of bin vent filters as given below:

$$\begin{aligned}\text{Annual Uncontrolled PE} &= \text{Daily throughput (tons/day)} \times \text{EF (lb/ton)} \times 365 \\ &\quad \text{days/yr} \div (1 - \text{CE}) \\ &= 25 \text{ tons/day} \times 0.024 \text{ lb/ton} \times 365 \text{ days/yr} \div (1 - \\ &\quad 0.99) \\ &= 21,900 \text{ lb-PM}_{10}/\text{yr}\end{aligned}$$

As shown above, the uncontrolled PE for PM<sub>10</sub> emissions is less than the major source threshold. Therefore, these units are not subject to CAM for PM<sub>10</sub> emissions.

S-75-5-7:

1. This unit contains emission limits for PM<sub>10</sub> only.
2. This unit has three bin vent filters (BH-1, BH-3 and BH-4) as an add-on control for PM<sub>10</sub> emissions.
3. Typically the District assumes that a dust collector will achieve 99% control for PM<sub>10</sub> emissions. Therefore, the uncontrolled emission rates can be determined using the emission limit on the current permit and the control efficiency of the dust collector:

Emissions from this unit consist of emissions from baghouse BH-1 only and the emissions from BH-3 and BH-4 are not included as they are included in emissions from S-75-1.

$$\begin{aligned}\text{BH-1: } &(6100 \text{ scf/min})(0.004 \text{ gr/scf})(24 \text{ hr/day})(60 \text{ min/hr})/7000 \text{ gr/lb} \\ &= 5.0 \text{ lb/day}\end{aligned}$$

$$\begin{aligned}\text{Uncontrolled emissions} &= (5.0 \text{ lb/day})(365 \text{ days/yr})/(1-0.99) \\ &= 182,500 \text{ lb/year}\end{aligned}$$

As shown above, the uncontrolled PE for PM<sub>10</sub> emissions is greater than the major source threshold. Therefore, this unit is subject to CAM for PM<sub>10</sub> emissions.

$$\begin{aligned}\text{Annual Controlled PE} &= 5.0 \text{ lb/day} \times 365 \text{ days/yr} \\ &= 1,825 \text{ lb/year}\end{aligned}$$

Since the post-control annual emissions do not exceed the Major Source threshold for PM<sub>10</sub> of 140,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM.

CAM compliance requires a visible emissions inspection in conjunction with daily monitoring of the pressure differential gauge and is satisfied by monitoring and recordkeeping of differential operating pressure and visible emissions.

- Condition 17, 18, 25, 28, 29, 30 & 31 on the proposed PTO S-75-5-7 will assure compliance with the applicable requirements of this subpart

S-75-6-25 & -11-21:

1. This unit contains emission limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC.
2. This unit has add-on controls for NO<sub>x</sub>, SO<sub>x</sub> and PM<sub>10</sub> emissions. There are no add-on controls for CO and VOC emissions, therefore, these units are not subject to CAM for CO and VOC emissions.
3. The CAM applicability for NO<sub>x</sub>, SO<sub>x</sub> and PM<sub>10</sub> emissions for these units has been discussed as given below:

NO<sub>x</sub> and SO<sub>x</sub>:

Per 40 CFR 64.2(b)(vi), emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1, are not required to comply with CAM requirements. A "continuous compliance determination method" means a method, specified by the applicable standard or an applicable permit condition, which: (1) is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard; and (2) provides data either in units of the standard or correlated directly with the compliance limit.

Therefore, this permit unit is exempt from NO<sub>x</sub> and SO<sub>x</sub> CAM requirements because the facility is already required to calibrate, maintain, and operate CEMS for both pollutants.

PM10:

PM10 emissions from these permit units are controlled with fabric filter and the controlled PM10 emissions are calculated in the table given below:

$$\begin{aligned} \text{PM}_{10} &= 0.04435 \times 9,600 \text{ MMBtu/day} \times 365 \text{ days/yr} \\ &= 155,417 \text{ lb/yr or } 77.7 \text{ tons/yr} \end{aligned}$$

Since controlled PM10 emissions are 77.7 ton/yr, uncontrolled emissions are expected to be greater than the Major Source threshold of 70 ton/yr. Therefore, this permit unit is subject to PM10 CAM requirements.

This permit unit is currently required to be equipped with pressure differential gauges and a continuous opacity monitoring system. However, the continuous opacity monitoring system is to ensure compliance with opacity, not the PM10 limit. Therefore additional requirements will be included to use both the pressure differential gauge and continuous opacity monitoring system to ensure compliance with PM10 emission limits.

- Condition 6, 7, 10, 71, 88, 93, 94, 95 & 96 on the proposed PTO S-75-6-25 will assure compliance with the applicable requirements of this subpart
- Condition 6, 7, 10, 70, 90, 95, 96, 97 & 98 on the proposed PTO S-75-11-21 will assure compliance with the applicable requirements of this subpart

S-75-7-3:

1. This unit contains emission limits for PM<sub>10</sub> and VOC only.
2. This unit has bin vent filter as an add-on control device for PM10 emissions and has no add-on control device for VOC emissions; therefore, it is not subject to CAM for VOC emissions.
3. The uncontrolled emission rates can be determined using the emission limit on the current permit of 0.01 gr/dscf, airflow rate of 475 cfm and PM<sub>10</sub> control efficiency of 99% as given below:

$$(475 \text{ cfm})(0.01 \text{ gr/scf})(24 \text{ hr/day})(60 \text{ min/hr})(365 \text{ days/yr}) / (7000 \text{ gr/lb})(1-0.99)$$

$$\text{Uncontrolled PE} = 35,666 \text{ lb-PM}_{10}/\text{yr}$$

As shown above, the uncontrolled PE for PM<sub>10</sub> emissions is less than the major source threshold. Therefore, this unit is not subject to CAM for PM<sub>10</sub> emissions.

S-75-9-6:

1. This unit contains emission limits for PM<sub>10</sub> only.
2. This unit has three dust collectors (#5, 6 & 7) as add-on controls for PM<sub>10</sub> emissions.
3. The uncontrolled emission rates can be determined using the emission limit from each dust collector and with 99% control efficiency as given below:

$$\begin{aligned}\text{Annual Uncontrolled PE} &= \text{EF for each dust collector (lb/hr)} \times 8,760 \text{ hrs/yr} + \\ &\quad (1 - \text{CE}) \\ &= (1.18 + 0.67 + 1.25) \text{ lb/hr} \times 8,760 \text{ hrs/yr} + (1 - \\ &\quad 0.99) \\ &= 2,715,600 \text{ lb-PM}_{10}/\text{yr}\end{aligned}$$

As shown above, the uncontrolled PE for PM<sub>10</sub> emissions is greater than the major source threshold. Therefore, this unit is subject to CAM for PM<sub>10</sub> emissions.

$$\begin{aligned}\text{Annual Controlled PE} &= (1.18 + 0.67 + 1.25) \text{ lb/hr} \times 8,760 \text{ hrs/yr} \\ &= 27,156 \text{ lb/year}\end{aligned}$$

Since the post-control annual emissions do not exceed the Major Source threshold for PM<sub>10</sub> of 140,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM.

CAM compliance requires a visible emissions inspection in conjunction with daily monitoring of the pressure differential gauge and is satisfied by monitoring and recordkeeping of differential operating pressure and visible emissions.

- Condition 23, 24, 47, 51, 52, 53 & 54 on the proposed PTO S-75-9-6 will assure compliance with the applicable requirements of this subpart

S-75-10-7:

1. This unit contains emission limits for PM<sub>10</sub> only.
2. This unit has two dust collectors (#9 & 11) as add-on controls for PM<sub>10</sub> emissions.
3. The uncontrolled emission rates can be determined using the emission limit, airflow rate of each dust collector and with 99% control efficiency as given below:

Controlled emissions from this unit consist of emissions from BH-9 (boiler area) and BH-11 (overfeed area)

BH-9: (20,000 scf/min) (0.004 gr/scf)(24 hr/day)(60 min/hr)/7000 gr/lb = 16.46  
BH-11: (11,750 scf/min) (0.0036 gr/scf)(24 hr/day)(60 min/hr)/7000 gr/lb = 8.70

Total = 25.2 lb/day

Annual Uncontrolled PE = Daily emissions x 365 days/yr + (1 – CE)  
= 25.2 lb/day x 365 days/yr + (1 – 0.99)  
= 919,800 lb/yr

Since this exceeds the PM10 major source threshold of 140,000 lb/year, CAM is applicable to this unit for PM10.

Annual Controlled PE = 25.2 lb/day x 365 days/yr  
= 9,198 lb/year

Since the post-control annual emissions do not exceed the Major Source threshold for PM10 of 140,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM.

CAM compliance requires a visible emissions inspection in conjunction with daily monitoring of the pressure differential gauge and is satisfied by monitoring and recordkeeping of differential operating pressure and visible emissions.

- Condition 23, 24, 35, 38, 39, 40 & 41 on the proposed PTO S-75-10-7 will assure compliance with the applicable requirements of this subpart

S-75-12-3, -13-3, -16-2, -17-2, -18-2, 19-2, -20-2, & -21-2:

1. These units do not contain emission limits for any pollutant. Therefore, these units are not subject to CAM.

#### **S. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone**

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2007 and 2008, and conditions 27 and 28 of S-75-0-2 assure compliance with the requirements.

## **IX. PERMIT SHIELD**

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

### **A. Requirements Addressed by Model General Permit Templates**

The applicant is not requesting to use any model general permit templates for this Title V renewal project.

### **B. Obsolete Permit Shields From Existing Permit Requirements**

There is not any permit shield removed, as the updated requirements of these rules are not applicable at this time.

## **X. PERMIT CONDITIONS**

See Attachment A - Renewed Title V Operating Permits.

## **XI. ATTACHMENTS**

- A. Renewed Title V Operating Permits
- B. Previous Title V Operating Permits
- C. Detailed Facility List
- D. District Rule 4601 Stringency Analysis
- E. Table of Standards in Rule 4601
- F. District's Response to Changes Proposed by Facility

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# ATTACHMENT A

Renewed Title V Operating Permits

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# San Joaquin Valley Air Pollution Control District

FACILITY: S-75-0-2

EXPIRATION DATE: 08/31/2007

## FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} 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. {4365} 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 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} 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, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} 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. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

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.

9. {4370} 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. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} 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. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} 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. {4376} 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. {4377} 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. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} 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. {4380} 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. {4381} 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. {4382} 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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

22. {4383} 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). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} 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 Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 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
24. {4385} All VOC-containing materials 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. {4386} 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. {4387} 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. {4388} 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. {4389} 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. {4390} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] 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.

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 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 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} 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. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} 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. {4399} 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. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
40. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan, and comply with all the requirements of Program 1, 2, or 3 when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
41. Facility shall comply with California Health and Safety Code Sections 44300 through 44384. [District Rule 4102 and California Health and Safety Code]
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All roads and roadways used by equipment associated with operation of boiler shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Particulate matter collected by fabric collectors shall be accumulated in closed containers and disposed of in a manner preventing entrainment in atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
45. Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods pursuant to Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
46. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404] Federally Enforceable Through Title V Permit
47. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$  if P is less than or equal to 30 tons per hour, or  $E = 17.31 \times P^{0.16}$  if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
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48. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] 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:** S-75-1-7

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

FUEL RECEIVING, SCREENING & CONVEYING OPERATION #1 INCLUDING 60 TON CAPACITY TRUCK TIPPER PLATFORM, FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 175 TON/HR FUEL TRANSFER CONVEYOR #1 WITH BELT SCALE SHARED W/S-75-2 (PHASE I) WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-1 TO DS-1, BC-9 TO BC-2, HOG-1 TO BC-2; STATION #2 SERVES POINTS BC-3 & BC-5), AND HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADER #1

## **PERMIT UNIT REQUIREMENTS**

1. Operation shall include ventilation system and fabric collector #2, with a minimum of 5,002 sq.ft. filter area and 100 hp exhaust fan, serving truck tippers, fuel receiving hoppers and inlets to the fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fabric collector #2 shall include 5 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall include belt type magnetic separator and magnetic separator take away conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operation shall include disk type scalping screen and swing hammer type hog, both with foam dust suppression and both vented to fabric collector #4. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operation shall include ventilation system and fabric collector #4, with minimum of 3,674 sq. ft. filter area and 60 hp exhaust fan (shared with S-75-5), serving disk type scalping screen, swing hammer type hog, and discharge of fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fabric collector #4 shall include 3 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Operation shall include 186 ton/hr capacity hog outfeed conveyor #2 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Operation shall include 186 ton/hr capacity fixed stacker conveyor #3 with operational foam dust suppression, two position diverter gate, and telescopic spout with dust pick-up shroud. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Operation shall include 186 ton/hr capacity stacker infeed conveyor #4, and 186 ton/hr capacity radial stacker conveyor #5 with telescopic spout with dust pickup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Operation shall include ventilation system with fabric collector #3 serving equipment associated with the 186 ton/hour hog, fixed stacker and infeed conveyor listed above (fixed stacker conveyor #3, diverter gate, telescopic spout, stacker infeed conveyor #4, radial stacker conveyor #5 and the head of hog outfeed conveyor #2), with a minimum of 3,263 sq.ft. filter area and 125 hp exhaust fan. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fabric collector #3 shall include 3 hp blower motor, rotary valve and auger. [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.

12. There shall be no visible emissions of 5% opacity or greater from truck tipper receiving hopper ventilation pickup points. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Truck tipper receiving hopper ventilation hood and hog ventilation hoods shall provide minimum indraft velocity of 200 ft/min during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Truck tipper receiving hopper drag chain conveyor transfer point hood shall provide minimum indraft velocity of 150 ft/min during entire truck unloading and fuel transfer to take away belt conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Truck tipper area ventilation system shall be equipped with interlocks and isolation valves which directs all air flow through operating truck tipper and prevents simultaneous operation of truck tippers. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Conveyor belt ventilation hood(s) shall provide minimum indraft velocity of 500 cfm/ft of belt width during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Scalping screen ventilation hood(s) shall provide minimum indraft velocity of 50 ft/min during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Truck tipper fabric collector #2 shall have minimum filter area of 5,002 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Scalping screen/hog area ventilation system shall be equipped with isolation valve which prevents air flow from primary screen and hog when this equipment is not in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Scalping screen/hog area fabric collector #4 shall have minimum filter area of 3,674 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Stacker/reclaimer area fabric collector #3 shall have minimum filter area of 3,263 sq. ft. and maximum air-to-cloth ratio of 8.2 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Each fabric collector shall be equipped with adjustable automatic reverse pulse filter cleaning mechanism and operational differential pressure indicator. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64 and District NSR Rule] Federally Enforceable Through Title V Permit
23. Each fabric collector shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 7 inches water column. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. Material removed from the fabric collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Variable height radial stacker, auxiliary stacker and reclaimers shall be ventilated to fabric collector, and discharge from stacker spouts shall be maintained as close as possible to top of storage pile. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Radial and auxiliary stacker conveyors BC3 and BC5 shall be equipped with foam injection nozzles which shall be operated as needed, to ensure dust emissions have visible emissions less than or equal to 20% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
28. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,200 ft/min. [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.

29. Deliveries of fuel shall not exceed 144 truck loads per day. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Drag chain transfer, point hood ventilation system and fabric collector shall operate whenever material is being transferred out of receiving bin. [District NSR Rule] Federally Enforceable Through Title V Permit
31. There shall be no visible emissions of 5% opacity or greater from truck tipper receiving hopper during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Truck tipper receiving hopper, ventilation hood system and fabric collector #2 shall be operated whenever material is being transferred into the hopper. [District NSR Rule] Federally Enforceable Through Title V Permit
33. There shall be no visible emissions of 5% opacity or greater from conveyor transfer points, scalping screen, and hog enclosures, including inlet and outlet openings. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Scalping screen/hog area fabric collector #4 shall be operated whenever material is being transferred from fuel receiving operations or storage pile to boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Stacker/reclaimer area fabric collector #3 shall be operated whenever material is being transferred to or from storage piles. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Auxiliary stacker shall not operate when radial stacker is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Fuel transfer conveyor shall be fully enclosed and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Radial stacker telescoping discharge spout height shall be continuously adjusted to minimize material drop distance to pile. [District NSR Rule] Federally Enforceable Through Title V Permit
39. Material to stacker shall contain no more than 3% by weight of fines capable of passing through 200 mesh screen. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Any stored fuel which is burning shall be immediately segregated and extinguished. [District Rule 4102 and District NSR Rule] Federally Enforceable Through Title V Permit
41. Records of types, amounts and origins (including distance from facility, copies of all purchase contracts, # of trucks, etc.) of offset fuels received shall be maintained and made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Air flow to fabric collector #2 shall not exceed 40,000 cfm and Particulate (PM-10) emissions from fabric filter #2 shall not exceed 0.0045 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Air flow to fabric collectors 3 and 4 shall not exceed 20,000 and 30,000 cfm respectively, and Particulate (PM-10) emissions from fabric collectors shall not exceed 0.004 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Fugitive particulate (PM-10) emissions from fuel storage piles shall not exceed 1.32 lb PM-10/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Wood waste delivery trucks shall remain covered during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
46. Operator shall record the daily number of fuel delivery truck loads. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
47. Operator shall record percentage of fines (passing #200 screen) in the material to the stacker. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
48. Visible emissions from the fabric collectors, truck tipper receiving hopper ventilation pickup points, conveyor transfer points, scalping screens, and hog enclosures (including inlet and outlet openings) shall be evaluated using EPA Method 9 for a period of at least 6 minutes at least once during each day that the unit is operated. [40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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49. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
50. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
51. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
52. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
53. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
54. During each day of operation, the permittee shall record the pressure drop of the fabric filters, and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
55. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] 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:** S-75-3-6

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

4,400 GALLON LIMESTONE STORAGE SILO (UNIT #1), WITH VAPOR SPACE TIED IN COMMON WITH SAND SILO PTO 75-4, INCLUDING BIN VENT FILTER WITH 95 SQUARE FOOT FILTER AREA, 1 HP EXHAUST FAN, 1/4 HP BAG SHAKER MOTOR, AND PRODUCT CONVEYING BLOWER

## **PERMIT UNIT REQUIREMENTS**

1. Storage silo shall vent through bin vent filters located on limestone storage silo S-75-3 and sand storage silo S-75-4. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Bin vent filters located on PTO S-75-3 and S-75-4 shall both be in operation and utilized when silo is being filled. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Limestone bin vent filter shall have a maximum air to cloth ratio of 8.54 ft./min and minimum filter area of 95 square feet. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Bin vent filter shall be equipped with mechanical shaker mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Bin vent filter shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Only crushed limestone shall be handled. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
8. There shall be no emissions in excess of 5% opacity from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Silo shall not receive more than 25 tons/day of product and particulate matter (PM10) emissions shall not exceed 0.024 lbs/ton loaded. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Permittee shall keep records of amounts and size of limestone received and make such records readily available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Permittee shall perform a complete vent filter inspection on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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13. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-4-6

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

65,828 GALLON SAND STORAGE (UNIT # 1) SILO, WITH VAPOR SPACE TIED COMMON WITH LIMESTONE SILO PTO S-75-3, INCLUDING BIN VENT FILTER WITH 120 SQ.FT. FILTER AREA, 1 HP EXHAUST FAN AND 1/4 HP BAG SHAKER MOTOR

## **PERMIT UNIT REQUIREMENTS**

1. Storage silo shall vent through bin vent filters located on limestone storage silo S-75-3 and sand storage silo S-75-4. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Bin vent filters located on PTO S-75-3 and S-75-4 shall both be in operation and utilized when silo is being filled. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Sand storage silo bin vent filter shall have a maximum air to cloth ratio of 8 ft./min and minimum filter area of 120 square feet. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Bin vent filter shall be equipped with mechanical shaker mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Bin vent filter shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
7. There shall be no emissions in excess of 5% opacity from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Silo shall not receive more than 25 tons/day of product and particulate matter emissions (PM10) shall not exceed 0.024 lbs/ton loaded. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Permittee shall keep records of amounts and size of limestone received for a period of five years and make such records readily available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Permittee shall perform a complete vent filter inspection on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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13. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] 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:** S-75-5-7

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

FUEL RECLAMATION, CONVEYING AND SCREENING OPERATION INCLUDING 45 TON/HR TRAVELING VARIABLE HEIGHT FUEL RECLAIMER WITH WATER SPRAY SYSTEM, RECLAIMER FEED TABLE, RECLAIMER CONVEYOR #6, AND AUXILIARY FUEL RECLAIM HOPPER (PHASE I) WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-9 TO BC-2, BC-10, DS-2 TO BC-8; STATION #2 SERVES TRANSFER POINTS BC-6 TO BC-7, DC-3 TO BC-7)

## **PERMIT UNIT REQUIREMENTS**

1. Operation shall include secondary feed conveyor #7 with belt scale, belt type magnetic separators, secondary disk type scalping screen, boiler feed conveyor #8, oversize conveyor #10 and distribution drag conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Operation shall include fuel abort bunker. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall include overfeed return conveyor #9 [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operation shall include fabric collector #3 (125 hp fan and 3,263 sq. ft. minimum filtering area) serving transfer point from reclaimer feed table, auxiliary fuel reclaim hopper inlet, and reclaim conveyor #6 shared with S-75-1. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operation shall include fabric collector #1 (25 hp fan and 750 sq. ft. minimum filtering area) serving head of boiler feed conveyor #8, inlet to secondary disk scalping screen and fuel abort bunker. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Operation shall include fabric collector #4 (100 hp fan and 3,674 sq. ft. min. filter area) serving discharge from conveyor #7, belt separator, inlet to fixed separator, discharge from secondary disk scalping screen, and MAC 95 cyclone #1, shared with permit S-75-1. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Material removed from each fabric collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Material collected by MAC 95 cyclone #1 shall discharge to conveyor BC-8, or to the covered truck loadout via a screw conveyor equipped with operational water sprays at the discharge point. [District Rule 2201] Federally Enforceable Through Title V Permit
9. There shall be no emissions in excess of 5% opacity from storage pile during reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
10. There shall be no emissions in excess of 5% opacity from conveyor transfer points, scalping screen, fuel storage bin inlet and outlet. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fabric collector #4 shall be operated whenever material is being transferred from fuel reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Fabric collector #1 shall be operated whenever material is being transferred from fuel reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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13. Fuel transfer conveyors shall be fully enclosed and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Conveyor belt ventilation hoods shall be designed to provide a minimum indraft velocity of 500 cfm/ft of belt width during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Fabric collector #1 shall have a minimum filtering area of 750 sq. ft. and a air to cloth ratio of 8 ft./min. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Each fabric collector shall be equipped with automatic, adjustable, reverse pulse filter cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Each fabric collector shall be equipped with operational differential pressure indicator. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64 and District Rule 2201] Federally Enforceable Through Title V Permit
18. Each fabric collector shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 7 inches water column. [40 CFR Part 64] Federally Enforceable Through Title V Permit
19. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,200 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
20. All access roads and roadways associated with fuel reclamation operation shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Permittee shall keep accurate records of material conveyed to fuel storage bin and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Fugitive PM10 emissions from the covered truck loading operation shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The maximum emission rate of PM-10 from fabric collector #1 shall not exceed 0.21 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Particulate matter emissions from the fabric filter dust collectors listed on this permit shall not exceed 0.004 grains/dscf in concentration. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
25. Visible emissions shall be evaluated using EPA Method 9 for a period of at least 6 minutes at least once during each day that the unit is operated. [40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
29. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
31. During each day of operation, the permittee shall record the pressure drop of the fabric filters, and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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32. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-6-25

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

400 MMBTU/HR EPI FLUIDIZED BUBBLING BED, BIOMASS-FUELED BOILER (UNIT #1) WITH NH<sub>3</sub>, LIMESTONE AND SAND INJECTION, WITH BOILER EXHAUST VENTED TO MULTICLONES AND FABRIC FILTER

## PERMIT UNIT REQUIREMENTS

1. 15 MMBtu/hr natural gas-fired boiler start-up burner shall be of "low-NO<sub>x</sub>" design utilizing staged combustion principles. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Boiler shall be equipped with two model ABB steam turbines powering a 32 MW (gross) electrical generator. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Boiler shall be equipped with a sodium bicarbonate (NaHCO<sub>3</sub>) injection system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Boiler shall be equipped with sand supply/reinjection system including bucket elevator #1 discharging to boiler or sand silo with bin vent filter. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Boiler shall be equipped with fluidized bed cleanout vibrating screen, enclosed bucket elevator #2, enclosed magnetic separator and enclosed circulating vibrating screen - with all enclosed equipment vented to boiler fuel inlet chute. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fabric collector shall be equipped with an operational differential pressure indicator. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64 and District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall establish parameters for the differential pressure across the fabric collector, which provides a reasonable assurance of ongoing compliance with emission limitations stated in this permit. The initial parameters shall be established using manufacturer/supplier recommendations and by correlating with opacity readings and source test results. These parameters shall be reviewed annually and revised if necessary based on PM<sub>10</sub> source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
8. Combustion air supply lines and auxiliary burner natural gas supply line shall be equipped with operational volumetric flow-rate indicators. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Selective non-catalytic reduction ammonia injection system shall be equipped with operational ammonia volume flow-rate indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Fabric collector exhaust stack shall be equipped with recording continuous monitors for opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO, O<sub>2</sub>, and flue gas volume flow-rate per Rule 1081. [40 CFR Part 64, and District Rules 2201 and 1081] Federally Enforceable Through Title V Permit
11. Continuous monitoring system for flue gas volume flow-rate shall meet E.P.A. monitoring performance specifications appearing in 40 CFR Part 52 appendix E. [40 CFR 60 Subpart Db and District Rule 4001] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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12. Only PUC quality natural gas, biomass, sand, limestone, ammonia, air, sodium bicarbonate (NaHCO<sub>3</sub>), and on-site generated dewatered cooling tower sludge shall be introduced into boiler. [District NSR Rule & Rule 4102] Federally Enforceable Through Title V Permit
13. Wood waste includes clean, chipped wood products, plywood, wood products manufacturing wood materials, construction and demolition wood materials, and wood pallets, crates and boxes. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
14. Natural gas used as fuel shall not exceed 5,691,429 std. cu. ft. per day. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Removal of ash from ash hoppers by manual means shall only be conducted during breakdown conditions or when boiler is not operating, and there shall be no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than ringelmann 1 or 20 % opacity. [District Rules 4101 & 4102] Federally Enforceable Through Title V Permit
16. Limestone, sodium bicarbonate (NaHCO<sub>3</sub>) and/or onsite generated cooling tower sludge, shall be injected into boiler at a rate in pounds per ton of biomass fuel introduced into boiler which results in compliance with the SO<sub>x</sub> emission limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Ammonia shall be injected into boiler at a rate, in pounds per ton of biomass fuel introduced into boiler, which results in compliance with the NO<sub>x</sub> emission limitation. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Ammonia injection shall be accomplished in the temperature range of 1600 to 1900 deg. F. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Ammonia injection rate shall be controlled to prevent the emission of free ammonia in excess of 20 ppmv or such level as required to prevent detectable odors or a maximum concentration of 50 ppmv at ground level. [District NSR Rule & 4102] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub> and PM<sub>10</sub> emission data shall be obtained and provided, as required by NSPS 40CFR60.48b "Emissions monitoring for particulate and nitrogen oxides." CEM data shall be provided as required by 60.48b(f). [40 CFR 60 Subpart Db and District Rule 4001] Federally Enforceable Through Title V Permit
21. Particulate matter (PM<sub>10</sub>) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.010 gr/dscf @ 12% CO<sub>2</sub> (of filterable particulate) and 17.74 lb/hr (including condensable particulate). [District NSR Rule] Federally Enforceable Through Title V Permit
22. Sulfur compound emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 23 ppmvd @ 3% O<sub>2</sub> and 15.66 lb/hr (as SO<sub>2</sub>). [District NSR Rule] Federally Enforceable Through Title V Permit
23. Oxides of Nitrogen emissions (as NO<sub>2</sub>), except for periods of startup and shutdown as defined in this permit, shall not exceed 0.10 lb/MMBtu and 40.00 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Volatile Organic Compound (VOC) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.02 lb/MMBTU and 8.0 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Carbon Monoxide (CO) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 181 ppmvd @ 3% O<sub>2</sub> and 56.00 lb/hr. On days in which a startup and shutdown of this unit occurs, CO emissions shall not exceed 500 lb/hr in any single hour during the startup or shutdown. [District NSR Rule & 4352, 5.1] Federally Enforceable Through Title V Permit
26. Boiler emission rates shall not exceed any of the following: PM<sub>10</sub>: 425.8 lb/day, SO<sub>x</sub> (as SO<sub>2</sub>): 375.8 lb/day, NO<sub>x</sub> (as NO<sub>2</sub>): 960.0 lb/day, VOC: 192.0 lb/day or CO (except during days of refractory cure or on days with startup and shut operations): 1344.0 lb/day. On days in which a startup and shutdown of this unit occurs, CO emissions shall not exceed 3,500 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
27. On days of refractory cure using startup burner, CO emissions shall not exceed 7,680 lb/day and heat input to boiler shall not exceed 3,909.4 MMBtu/day. Compliance with CO emission limit on each refractory cure day shall be demonstrated by records of fuel use, fuel heat content, and resulting daily heat rate input. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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28. On days of refractory cure using 40 MMBtu/hr refractory cure heaters, heat input shall not exceed 960 MMBtu/day to the refractory cure heaters. Refractory burner emission rates shall not exceed any of the following: PM10:0.0076 lb/MMBtu, SOx (as SO2): 0.00285 lb/MMBtu, NOx (as NO2): 0.1 lb/MMBtu, VOC: 0.0055 lb/MMBtu or CO: 0.3 lb/MMBtu. Daily records of fuel use, fuel heat content, and resulting daily heat rate input shall be kept, to demonstrate compliance with emission limits during refractory curing. [District NSR Rule] Federally Enforceable Through Title V Permit
29. This boiler shall not be operated under refractory cure conditions for more than 6 days per year. Refractory cure shall not be performed on more than one unit (Boiler #1, S-75-6 or Boiler #2, S-75-11) at any time. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Permittee shall notify the District in writing of the start date and end date of operating under refractory cure and alternate CO emission limit condition. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Excess emissions for NOx, SOx and CO for the continuous monitoring system shall be defined as any 24 hour period during which the average emissions of NOx, SOx or CO exceed any emission limit, except as noted in this permit on days of refractory cure or on day(s) in which a startup or shutdown of this unit occurs. [District NSR Rule] Federally Enforceable Through Title V Permit
32. "Startup" is the period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. [District NSR Rule & 4352, 5.3.2] Federally Enforceable Through Title V Permit
33. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. [District NSR Rule] Federally Enforceable Through Title V Permit
34. "Shutdown" is the period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 & 75%. [District NSR Rule & 4352, 5.3.1] Federally Enforceable Through Title V Permit
35. "Steady state" load is defined as the operational conditions that generate electrical power at + or - one (1) Megawatt from the target load established and documented by control room log book. [District NSR Rule] Federally Enforceable Through Title V Permit
36. During startup and shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201 & 4352, 5.3.3] Federally Enforceable Through Title V Permit
37. Annual audits of continuous monitors shall be conducted by independent laboratory in accordance with E.P.A. guidelines, shall be witnessed by District and results shall be submitted to District within 60 days of such audit pursuant to Rule 1080. [District Rule 1080] Federally Enforceable Through Title V Permit
38. Compliance with biomass fuel contamination limits shall be demonstrated by sorting a District approved 25 ton representative sample of biomass fuel in the reclaim pile upon District request. [District Rule 4102]
39. Data collected during sorting of 25 ton sample of biomass fuel shall be in pounds of material per ton of biomass, by category as identified in fuel contamination limit condition, and official test results and field data shall be submitted within 30 days after collection. [District Rule 4102]
40. Compliance with PM10, SOx, NOx and CO emission sampling limits (except CO during designated refractory cure days) shall be demonstrated by District-witnessed sample collection by independent testing laboratory annually 60 days prior to August 31st permit anniversary date, or within 60 days of startup if the unit did not operate between July 3 and August 1. [District Rules 1081 & 4352, 6.3.1] Federally Enforceable Through Title V Permit
41. Source testing for the following parameters shall be conducted using the stated test methods: NOx - EPA Method 7 or ARB Method 100; CO - EPA Method 10 or ARB Method 100; CO2 - EPA Method 3 or ARB Method 100; O2 - EPA Method 3 or 3A, or ARB Method 100; SO2 - EPA Method 6 or ARB Method 100; PM10 - EPA Methods 201A & 202; NOx emission rate (Heat input basis) - EPA method 19; Stack Gas Velocities - EPA Method 2; Moisture Content - EPA Method 4; Ammonia - BAAQMD ST1B and Solid Fuel Higher Heating Value - ASTM Method D2015 or E711. [District NSR Rule & 4352, 6.4.1] Federally Enforceable Through Title V Permit

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42. Official test results and field data from compliance testing shall be submitted within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
43. Permittee shall annually offset actual emissions of the following pollutant emission rates in pounds per year: PM10, 219,037; SO2, 143,883 (PM impact only); NOx 238,527; VOC 54,750; CO, 614,186 through the elimination of sufficient annual tonnage of agricultural waste diverted from open burning. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Permittee shall project and use the proper mix of fuels to ensure that actual emissions from boiler S-75-6 are offset with creditable biomass on a quarterly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Open-burning emission factors used to determine the quantity of offsets available from the diversion of biomass from open-burning are listed in the attachment "Open Burn Emission Factors" (District policy SSP-2005). [District NSR Rule] Federally Enforceable Through Title V Permit
46. If quarterly actual emissions from boiler S-75-11 are greater than zero, the emission reduction credit from creditable biomass fuel shall be calculated using the following formula:  $Pq = x * [\text{sum of } j=1 \text{ to } n \text{ for } (Bj) * (EFj) * (HBFj) * (QDFjq)]$  where:  $Pq$  = Pollutant offset credit in lb/qtr = sum of emissions (by pollutant) from ag waste credit < 15 miles + emissions > 15 miles from facility.  $q$  = calendar quarter,  $x = 0.5$  for biomass originating > 15 miles and 0.833 for < 15 miles.  $j$  = each creditable biomass type.  $B$  = tons of biomass type ( $j$ ) used per quarter.  $EF$  = emission factor for particular biomass (from SSP-2005).  $HBFj$  = fraction of biomass type ( $j$ ) that has been demonstrated to have historically open field burned (for orchard prunings  $HBF=0.96$ , for other biomass a District approved  $HBF$  factor must be used).  $QDFjq$  = Quarterly distribution factor - fraction of burning of biomass ( $j$ ) which occurs in calendar quarter ( $q$ ). For orchard prunings  $QDF = Q1: 0.251, Q2: 0.275, Q3: 0.149, Q4: 0.325$ . [District NSR Rule] Federally Enforceable Through Title V Permit
47. Permittee shall maintain accurate records of continuous emissions monitoring (CEM) results, dates of occurrences and duration of start-up, shutdown, malfunction, performance testing, evaluations, calibrations, checks, adjustments and maintenance, and daily records of natural gas fuel usage. Records required by this permit shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2201 and 1080] Federally Enforceable Through Title V Permit
48. Daily records for each load of creditable biomass received shall be maintained which include the geographic origin (for applicability of distance offset ratio), date, weigh ticket number, supplier name, fuel type, tons received, the offset ratio for the load of biomass, and the amount of offset credit (in pounds of NOx) attributable to each load of biomass. Records shall include certifications that any creditable biomass for which offset credit is claimed has historically been open burned in the San Joaquin Valley air basin. [District NSR Rule] Federally Enforceable Through Title V Permit
49. Permittee shall demonstrate compliance with the emission offset requirements by submitting to the District a quarterly report accounting for the tonnage of agricultural waste eliminated from open field burning and used as plant fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
50. Quarterly report of agricultural waste eliminated from open field burning used as fuel at facility shall document creditable ag waste fuel receipt quantities, if fuel originates > 15 miles from facility, offset credit ratios, emission factors used, and summary of the resultant emissions offsets provided using "the procedure", and shall be submitted to the District within 30 days of the end of the quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
51. Quarterly report, of agricultural waste eliminated from open field burning used for the purpose of providing required offsets, shall document historical biomass fraction (HBF) and quarterly distribution factor (QDF) for each biomass fuel used to calculate credit. For orchard prunings  $HBF = 0.96$  and  $QDF =$  as stated in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
52. This PTO involved a NOx BACT re-determination, which was based on the argument that relaxing the NOx BACT limit would eliminate optically dense visible emissions. Should optically dense visible emissions continue or recur, this BACT re-determination shall be nullified, and the NOx BACT emission limit shall revert to 0.08 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit

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53. **FACILITIES OPERATION:** All equipment, facilities, and systems shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
54. **MALFUNCTION:** The Director of the Air and Toxics Division shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit. In addition, the Director of the Air and Toxics Division shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of the permit or of any law or regulations which such malfunction may cause. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
55. **RIGHT TO ENTRY:** The Regional Administrator, the head of the State Air Pollution Control Agency, the head of the responsible local air pollution control agency, and/or their authorized representatives, upon the presentation of credentials, shall be permitted: A) to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit; B) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; C) to inspect any equipment, operation, or method required in this permit; D) to sample emissions from the source. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
56. **TRANSFER OF OWNERSHIP:** In the event of any changes in control or ownership, this permit shall be binding on all subsequent owners and operators. The applicant shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the Regional Administrator and the State and local Air Pollution Control Agency. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
57. **SEVERABILITY:** The provisions of this permit are severable, and, if any provisions of this permit is held invalid, the remainder of this permit shall not be affected thereby. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
58. **OTHER APPLICABLE REGULATIONS:** The owner and operator shall operate the stationary source in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, state and local air quality regulations. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
59. **AIR POLLUTION CONTROL EQUIPMENT:** Limestone shall be injected directly into the combustion chambers of the boiler as required to attain the emission limit for SO<sub>2</sub>. Based on previous operating experience, DECI shall, to the best of its ability, anticipate periods when a high sulfur biomass fuel and/or inherently low calcium bearing biomass fuel is utilized such that the addition of limestone is required to attain the emission limits. A SNCR system utilizing ammonia injection shall be incorporated within the boilers. Ammonia shall be injected continuously during all periods of operation at a rate which results in compliance with the NO<sub>x</sub> emission limits. It is ultimately, DECI's burden to maintain SO<sub>2</sub> and NO<sub>x</sub> emissions below the limits given in this permit during all periods of operations independent of biomass fuel type and fuel availability. Biomass fuel type, availability, and/or composition can not be utilized as a rationale for excess emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
60. **PERFORMANCE TESTS:** At times as specified by EPA, DECI shall conduct performance tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> and furnish the Kern County Air Pollution Control District and EPA a written report of the results of such tests. The tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted on an annual basis and at the maximum operating capacity of the facility being tested. Upon written request (Attn: A-3-3) from DECI, EPA may approve the conducting of performance tests at a lower specified production rate. Also, upon written request from DECI, EPA may approve the deletion of a specific annual test for the combustion unit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit

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61. **PERFORMANCE TEST METHODS:** Performance tests for the emissions of SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted and the results reported in accordance with the test methods set forth in 40 CFR 60, Part 60.8 and Appendix A and 40 CFR Part 51 Appendix M. The following test methods shall be used: a) Performance tests for the emission of SO<sub>2</sub> shall be conducted using EPA Methods 1-4, and b) Performance tests for the emissions of NO<sub>x</sub> shall be conducted using EPA Methods 1-4, and c) Performance tests for the emissions of PM<sub>10</sub> shall be conducted using EPA Method 201(a), and d) Performance tests for the emissions of CO shall be conducted using EPA Methods 1-4 and 10. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
62. **PERFORMANCE TEST NOTICE:** EPA (Attn: A-3-3) shall be notified in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. such prior approval will minimize the possibility of EPA rejection of test results for procedural deficiencies. In lieu of the above mentioned test methods, equivalent methods may be used with prior written approval from EPA. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
63. **PERFORMANCE TEST ACCOMMODATIONS:** For performance test purposes, sampling ports, platforms, and access shall be provided by DECI on the combustion exhaust system in accordance with 40 CFR 60.8(e). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
64. **SO<sub>2</sub> EMISSION LIMIT:** Boiler shall not discharge or cause the discharge into the atmosphere SO<sub>2</sub> in excess of the more stringent of 13.2 lb/hr or 18.8 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 316.8 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
65. **NO<sub>x</sub> EMISSION LIMIT:** Boiler shall not discharge or cause the discharge into the atmosphere NO<sub>x</sub> (asNO<sub>2</sub>) in excess of the more stringent of 32 lb/hr or 63 ppmvd @ 3% O<sub>2</sub> (24-hour rolling average) or 767.5 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01 and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
66. **PM<sub>10</sub> EMISSION LIMIT:** Boiler shall not discharge or cause the discharge into the atmosphere filterable PM<sub>10</sub> in excess of the more stringent of 8.9 lb/hr or 0.01 gr/dscf @ 12% CO<sub>2</sub> (3-hour rolling average) or 213 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
67. **CO EMISSION LIMIT:** Boiler shall not discharge or cause the discharge into the atmosphere CO in excess of the more stringent of 56 lb/hr or 183 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 1344 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
68. **OPACITY:** Boiler shall not discharge or cause the discharge into the atmosphere any gases with an opacity in excess of 20% except for aggregate periods of less than 3 minutes in any one hour period from each of the stacks venting each of the fluidized bed combustion units. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
69. **BOILER HEAT INPUT:** DECI shall continuously record the steam output and the steam temperature and pressure from the boiler; also, DECI shall determine the boiler efficiency annually. The heat input, as determined from the boiler efficiency and steam production rate, shall not exceed 400 MMBtu/hr. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
70. **OFFSET RESTRICTION:** If the emission limit for any of the above pollutants (SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub>, and CO) is revised, the difference between the pollutant emission limit set forth above and the lower pollutant emission limit shall not be allowed as an emission offset for future construction or modification. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
71. **CONTINUOUS MONITORING:** DECI shall maintain and operate a continuous monitoring system to measure stack gas NO<sub>x</sub>, CO, SO<sub>x</sub>, O<sub>2</sub> and Opacity in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR 60.13 and 40 CFR 60, Appendix B, Performance Specifications 1,2,3,and 4). [40 CFR Part 64, District Rule 4001 and PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
72. **CONTINUOUS MONITORING:** DECI shall maintain and operate a continuous monitoring system to measure stack gas volumetric flow rates in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR Part 60, Appendix B, Performance Specification 6). [PSD ATC SJ 90-01] 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.

73. CONTINUOUS MONITORING REPORT: DECI shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. b) Specific identification of each period of excess emissions that occurs during start-ups, shutdowns, and malfunctions of any of the boilers. The nature and cause of any malfunction (if known) and the corrective action take or preventative measures adopted shall also be reported. c) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments. d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
74. CONTINUOUS MONITORING: Excess emissions shall be defined as any three-hour period during which the average emissions of PM10, SO2, and/or CO, as measured by the continuous monitoring system or by a performance test, exceeds the maximum emission limits. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
75. CONTINUOUS MONITORING: Excess emissions shall be defined as any 24-hour period during which the average emissions of NOx, as measured by the continuous monitoring system or by a performance test, exceeds the NOx maximum emission limit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
76. CONTINUOUS MONITORING: Excess emissions shall be defined as any three-minute period during which the average opacity as measured by the continuous monitoring system exceed the maximum emission limit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
77. CONTINUOUS MONITORING: Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limits for the purposes of this permit except for SO2 and CO 3-hour emission limits and the opacity minute limit during normal startup or shutdown: (1) Startup shall be considered that period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. (2) Shutdown shall be considered that period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 and 75%. (3) Daily emission limits apply at all times except during refractory cure. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
78. CONTINUOUS MONITORING: DECI shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
79. FUEL USE: Only PUC quality natural gas, biomass, sand, limestone, ammonia, air and onsite generated, dewatered cooling tower sludge shall be fired in boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
80. FUEL USE: Biomass fuel sulfur shall not exceed 0.90% dry weight and biomass fuel nitrogen shall not exceed 2.5% dry weight. [District NSR Rule, PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
81. FUEL USE: Biomass means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removals, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips and wood waste, including clean, chipped wood products, plywood, particle board, fiberboard and wood products manufacturing wastes, wood based construction demolition materials, pallets, crates and boxes. Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal solid waste. [District Rules 2201 and 4102, PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
82. FUEL USE: Additional biomass fuels may be administratively appended to this list upon a written request by the permittee to add an unlisted fuel, and provided the permittee can demonstrate that emissions of affected pollutants will not increase and that the boiler is designed to accommodate such fuel without physical or operational modifications. [PSD ATC SJ 90-01] 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.

83. FUEL USE: Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal waste. In addition, contamination of the biomass fuel shall not exceed 0.04% by weight plastics and 0.62% by weight of metals, plastics, paper, painted wood, preservative treated wood and nonwood roofing materials (except asbestos). [PSD ATC SJ 90-01, District Rule 4102] Federally Enforceable Through Title V Permit
84. FUEL USE: The permittee shall continuously record the steam output from the boiler and shall annually determine boiler efficiency from the results of boiler efficiency tests. From these parameters the heat input to the boiler (on a 365 day rolling average) shall be determined and recorded. The heat input as determined from the boiler efficiency and steam production rate shall not exceed 315 MMBtu/hr. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
85. FUEL USE: The boiler shall not consume more than 14,285.7 scf/hr of natural gas with a higher heating value (HHV) of 1,050 Btu/scf. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
86. NEW SOURCE PERFORMANCE STANDARDS: The boiler shall meet all applicable requirements of 40 CFR 60 Subparts A and Db. [PSD ATC SJ 90-01, District Rule 4001] Federally Enforceable Through Title V Permit
87. AGENCY NOTIFICATIONS: All correspondence as required by this Operating Permit shall be forwarded to the following addresses: 1) Director, Air and Toxics Division (Attn: A-3-3), EPA Region 9, 75 Hawthorne St, San Francisco, CA 94105; 2) Chief, Stationary Source Division, California Air Resources Board, PO Box 2815, Sacramento, CA 95812; 3) Assistant Air Pollution Control Officer, SJVUAPCD, 34946 Flyover Court, Bakersfield, CA 93308. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
88. The owner/operator shall operate, maintain and calibrate Continuous Emission Monitoring system pursuant to the requirements of 40 CFR 60.7 (c) and 60.13. CEMs must also satisfy the Performance Specifications of 40 CFR 60 Appendix B and the Relative Accuracy Test Audit of Appendix F. [40 CFR Part 64, District Rule 4352, 5.5] Federally Enforceable Through Title V Permit
89. The owner/operator shall maintain an operating log that includes the type and quantity of fuel used and the hhv of each fuel as determined by District Rule 4352, section 6.4 (as amended 05/18/06), or as certified by a third party fuel supplier. [District Rule 4352, 6.2] Federally Enforceable Through Title V Permit
90. The compliance determination shall not be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352, 6.3.3] Federally Enforceable Through Title V Permit
91. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
92. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
93. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
94. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
95. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
96. During each day of operation, the permittee shall record the pressure drop of the fabric filter, and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
97. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.



98. Particulate Matter emissions shall not exceed 10.0 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
99. Records of startup and shutdown times and startup and shutdown emissions shall be maintained [District Rule 2201] 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:** S-75-7-4

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

44,883 GALLON ASH STORAGE SILO WITH UNLOADING SPOUT, BOTH SERVED BY BIN VENT FILTER WITH 95 SQ.FT FILTER AREA AND 1/2 HP MOTOR - SILO RECEIVING MATERIAL FROM PHASE I AND PHASE II ASH HANDLING CONVEYOR

## **PERMIT UNIT REQUIREMENTS**

1. Phase I ash handling system shall include three boiler ash conveyors, eight baghouse rotary feeders, two baghouse conveyors, one main ash conveyor and one silo conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Phase II ash handling system shall include one boiler ash conveyors, six baghouse rotary feeders, two baghouse conveyors, one main ash conveyor and one silo conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Silo shall include vibrating bin, rotary feeder, bin vent filter and paddle type ash conditioner. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Ash shall not be removed from any ash hopper, conveying system or ash silo by manual means during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Operation shall include telescoping ash unloading spout and 5 hp dust withdrawal fan discharging collected particulate back into ash silo served by bin vent. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Only material which has been mixed with sufficient water to prevent visible emissions, of 5% opacity or greater, shall be unloaded from ash silo unloading conditioner. [District NSR Rule] Federally Enforceable Through Title V Permit
8. There shall be no visible emissions of 5% opacity or greater from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Only covered truck shall be loaded with ash silo contents. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Storage silo shall vent only through bin vent filter. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Bin vent filter shall have a maximum air to cloth ratio of 5 ft./min, and minimum filter area of 95 sq. ft. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Bin vent filter shall be equipped with adjustable, automatic reverse pulse jet cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Bin vent filter shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Ash silo unloading conditioning unit shall be dust tight. [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.

15. Records of amounts of ash loaded into disposal trucks shall be maintained and made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The maximum emission rate of volatile organic compounds shall not exceed 0.02 lbm/day. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Particulate matter emissions shall not exceed 0.010 grains/dscf in concentration. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] 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:** S-75-9-6

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

FUEL RECEIVING, SCREENING & CONVEYING OPERATION INCLUDING 60 TON CAPACITY TRUCK TIPPER PLATFORM, FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 100 TON/HR FUEL RECEIVING CONVEYOR #11 W/BELT SCALE WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-11 TO DS-3, HOG-2 TO BC-13, BC-12; STATION #3 SERVES POINTS BC-16 & BC-17), AND HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADER #3

## **PERMIT UNIT REQUIREMENTS**

1. Truck tipper platform, fuel receiving hopper, and fuel receiving conveyor shall vent only to fabric collector #5. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fuel receiving operation shall include belt type magnetic separator #3. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Fuel receiving operation shall be equipped with ventilation system and fabric collector #5 with a minimum filter area of 4,875 sq. ft., maximum air-to-cloth ratio of 8:1, 100 hp exhaust fan, 5.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Fuel receiving operation shall be equipped with disk type scalping screen and two position pneumatically operated diverter gate #5. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fuel receiving operation shall be equipped with swing hammer type hog with metal trap. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fuel receiving operation shall be equipped with 50 ton/hr capacity disk screen overs conveyor #12 with operational foam dust suppression, 100 ton/hr capacity screen/hog discharge conveyor #13 with operational foam dust suppression, and 135 ton/hr capacity fuel transfer conveyor #14. [District NSR Rule]
7. Fuel receiving operation shall be equipped with ventilation systems and fabric collector #6 with a minimum filter area of 2,505 sq. ft., maximum air-to-cloth ratio of 8:1, 60 hp exhaust fan, 3.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Fabric collector #6 shall serve disk type scalping screen, diverter gate #5, swing hammer type hog, disk screen overs conveyor #12, screen/hog discharge conveyor #13, and fuel transfer conveyor #14. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fuel receiving operation shall be equipped with two position pneumatically operated diverter gates number 6 and number 7. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Fuel receiving operation shall be equipped with 135 ton/hr capacity fixed stacker feed conveyor #17 with operational foam dust suppression. [District NSR Rule]
11. Fuel receiving operation fixed stacker shall be equipped with telescoping spout with dust pick-up shroud. [District NSR Rule]
12. Fuel receiving operation shall be equipped with 170 ton/hr capacity radial stacker feed conveyor #15. [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.

13. Fuel receiving operation shall be equipped with 170 ton/hr capacity radial stacker conveyor #16 with operational foam dust suppression shared with permit unit S-75-10. [District NSR Rule]
14. Fuel receiving operation radial stacker shall be equipped with telescoping spout with dust pick-up shroud. [District NSR Rule]
15. Foam injection nozzles on radial and fixed stacker conveyors BC16 and BC17 shall be operated as needed, to ensure dust emissions have visible emissions of less than or equal to 20% opacity. [District NSR Rule]
16. Fuel receiving operation shall be equipped with ventilation system and fabric collector #7 with minimum of 4,466 sq. ft. filter area, maximum air-to-cloth ratio of 8:1, 200 hp exhaust fan, 5.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Fabric collector #7 shall serve diverter gates #6 and #7, fixed stacker feed conveyor #17, fixed stacker telescoping spout, radial stacker feed conveyor #15, radial stacker conveyor #16, radial stacker telescoping spout, and equipment identified on permit S-75-10. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Truck tipper receiving hopper ventilation pickup points shall prevent particulate matter emissions to atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Truck tipper receiving hopper ventilation hood and hog ventilation hoods shall provide minimum indraft velocity of 200 ft./min. during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Truck tipper receiving hopper drag chain conveyor transfer point hood shall provide minimum indraft velocity of 150 ft./min. during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Conveyor belt ventilation hood(s) shall provide minimum indraft velocity of 500 cfm/ft. of belt width during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Scalping screen ventilation hood shall be designed to provide minimum indraft velocity of 50 ft./min. during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Each fabric collector shall be equipped with adjustable automatic reverse pulse filter cleaning mechanism and operational differential pressure indicator. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64 and District NSR Rule] Federally Enforceable Through Title V Permit
24. Each fabric collector shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 7 inches water column. [40 CFR Part 64] Federally Enforceable Through Title V Permit
25. Radial stackers telescoping spout discharge height shall be maintained as close as possible to top of storage pile. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Each ventilation system duct shall be equipped with capped 3/4 in. pitot port in an accessible location to facilitate duct velocity determination measurement. [District Rule 1081] Federally Enforceable Through Title V Permit
27. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,400 ft./min. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Deliveries of wood waste fuel shall not exceed 46 truck loads per day without prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Ventilation system and fabric collector shall operate whenever material is being transferred into or out of receiving hoppers. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Wood waste delivery trucks shall remain covered during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
31. There shall be no visible emissions of 5% opacity or greater from truck tipper or receiving hopper during entire unloading operation. [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.

32. Truck tipper receiving hopper fabric collector #5 shall be operated whenever material is being transferred into and out of hoppers. [District NSR Rule] Federally Enforceable Through Title V Permit
33. There shall be no visible emissions of 5% opacity or greater from conveyor transfer points, scalping screen, and hog enclosures, including inlet and outlet openings. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Ventilation system and fabric collector #6 shall be operated whenever material is being transferred from fuel receiving operation. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Ventilation system and fabric collector #7 shall be operated whenever material is being transferred from fuel receiving operations. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Material removed from each fabric collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Fuel transfer conveyors shall be covered and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Any stored fuel which is burning shall be immediately segregated and extinguished. [District NSR Rule] Federally Enforceable Through Title V Permit
39. All access roads and roadways associated with truck unloading operations shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Operator shall visually check each truckload for unacceptable fuel before unloading. For non-agricultural fuel (e.g. secondary wood), a representative sample shall be taken from each source each day and stored for one month. [District NSR Rule] Federally Enforceable Through Title V Permit
41. Fuel samples shall be made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Particulate matter (PM-10) emissions from all fabric collectors shall not exceed 0.004 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Particulate matter (PM-10) emissions from truck dump area fabric collector #5 shall not exceed 1.18 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Particulate matter (PM-10) emissions from scalping screen/hog area fabric collector #6 shall not exceed 0.67 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Particulate matter (PM-10) emissions from stacker/reclaimer fabric collector #7 shall not exceed 1.25 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
46. Fugitive particulate matter (PM-10) emissions from fuel storage piles shall not exceed 60.81 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
47. Visible emissions shall be evaluated using EPA Method 9 for a period of at least 6 minutes at least once during each day that the unit is operated. [40 CFR Part 64] Federally Enforceable Through Title V Permit
48. Official test results and field data collected shall be submitted to the District within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
49. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
50. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
51. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] 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.

52. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
53. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
54. During each day of operation, the permittee shall record the pressure drop of the fabric collector, and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
55. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
56. Operator shall record the daily number of truck deliveries of wood waste fuel. [District Rule 2520, 9.4.2] 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:** S-75-10-7

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

FUEL RECLAMATION, CONVEYING & SCREENING OPERATION INCLUDING 35 TON/HR TRAVELING VARIABLE HEIGHT FUEL RECLAIMER #DC-4 WITH WATER SPRAY SYSTEM AND BOOMING AND SLEWING SYSTEM (SHARED WITH S-75-9) (PHASE II) WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS DS-4 ABORT CHUTE, DS-4 TO BC-21; STATION #3 SERVES TRANSFER POINTS BC-18 TO BC-20, BC-19 TO BC-20)

## **PERMIT UNIT REQUIREMENTS**

1. Fuel reclamation operation shall be equipped with reclaimer table and reclaim transfer conveyor #19 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fuel reclamation operation shall be equipped with self-cleaning belt-type magnetic separator #4, and magnetic discharge take away conveyor #24. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Fuel reclamation operation shall be equipped with partially enclosed 35 ton/hr auxiliary reclaim hopper #DC-5 with water sprays, and inclined live chain bottom and double spike roll discharger. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Fuel reclamation operation shall be equipped with 35 ton/hr capacity auxiliary reclaimer discharge conveyor #18. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #7. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fuel reclamation operation shall be equipped with 35 ton/hr capacity, secondary screen feed conveyor #20 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Fuel reclamation operation shall be equipped with self cleaning, belt type, magnetic separator #5 and collection system. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #8. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fuel reclamation operation shall be equipped with secondary disk type, scalping screen and oversized discharge chute and bunker. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Fuel reclamation operation shall be equipped with 35 ton/hr capacity boiler feed conveyor #21 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fuel reclamation operation shall be equipped with ventilation system, cyclone #2 (MAC H85) and fabric collector #9 with minimum of 1,832 sq. ft. filter area, maximum air-to-cloth ratio of 10.92 ft/min, 60 hp exhaust fan, reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Material collected by MAC H85 cyclone #2 shall discharge either to conveyor BC-21 or to the covered truck loadout listed on permit S-75-5. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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13. Secondary scalping screen fabric collector #9 shall serve secondary screen conveyor #20, magnetic separator #5, diverter gate #8, secondary scalping screen, discharge chute and bunker, boiler feed conveyor, and beginning of fuel reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Fuel reclamation operation shall be equipped with boiler distribution conveyor #DC-6. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Fuel reclamation operation shall be equipped with 35 ton/hr capacity, overfeed conveyor #22. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #9. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Fuel reclamation operation shall be equipped with abort bunker. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Fuel reclamation operation shall be equipped with ventilation system and fabric collector #11 with minimum of 1430 sq. ft. filter area, maximum air-to-cloth ratio of 8.2 ft/min, 50 hp exhaust fan, reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Boiler area fabric collector #11 shall serve boiler distribution conveyor #DC-6, overfeed conveyor #22, diverter gate #9, abort bunker, and existing #BC-9. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Conveyor belt ventilation hood(s) shall provide minimum indraft velocity of 500 cfm/ft. of belt width during fuel reclamation, conveying and screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Secondary scalping screen ventilation hood shall provide minimum indraft velocity of 50 ft./min. while screen is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Each fabric collector shall be equipped with adjustable automatic reverse pulse filter cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Each fabric collector shall be equipped with operational differential pressure indicator. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64 and District NSR Rule] Federally Enforceable Through Title V Permit
24. Each fabric collector shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 7 inches water column. [40 CFR Part 64] Federally Enforceable Through Title V Permit
25. Material removed from each fabric collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Each ventilation system duct shall be equipped with capped 3/4 in. pitot port in an accessible location to facilitate duct velocity determination measurement. [District NSR Rule] Federally Enforceable Through Title V Permit
27. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,400 ft./min. [District NSR Rule] Federally Enforceable Through Title V Permit
28. There shall be no visible emissions of 5% opacity or greater from storage pile during reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
29. There shall be no visible emissions of 5% opacity or greater from conveyor transfer points, scalping screen, and fuel storage bin, including inlet and outlet openings. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Boiler area fabric collector #11 shall be operated whenever material is being transferred from fuel reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Fuel transfer conveyors shall be covered and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Particulate matter (PM10) emissions from fabric collector #9 shall not exceed 0.004 gr/scf, and maximum air flow shall not exceed 20,000 cfm. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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33. Particulate matter (PM10) emissions from fabric collector #11 shall not exceed 0.0036 gr/scf, and maximum air flow shall not exceed 11,750 cfm. [District NSR Rule] Federally Enforceable Through Title V Permit
34. All access roads and roadways associated with fuel reclamation operation shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Visible emissions shall be evaluated using EPA Method 9 for a period of at least 6 minutes at least once during each day that the unit is operated. [40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
39. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
40. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
41. During each day of operation, the permittee shall record the pressure drop of the fabric filters, and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
42. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-11-21

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

315 MMBTU/HR EPI FLUIDIZED BUBBLING BED, BIOMASS-FUELED BOILER (UNIT #2) WITH NH<sub>3</sub>, LIMESTONE AND SAND INJECTION, WITH BOILER EXHAUST VENTED TO FABRIC FILTER

## PERMIT UNIT REQUIREMENTS

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1. 15 MMBtu/hr start-up and 40 MMBtu/hr overhead natural gas-fired burners shall be of "low-NO<sub>x</sub>" design utilizing staged combustion principles. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Boiler shall be equipped with two steam turbines powering a 24.5 MW (gross) electrical generator. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Boiler shall be equipped with a sodium bicarbonate (NaHCO<sub>3</sub>) injection system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Boiler shall be equipped with sand supply/reinjection system including two bucket elevators. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Boiler exhaust shall be served by fabric collector. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fabric collector shall be equipped with operational differential pressure indicator. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [40 CFR Part 64 and District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall establish parameters for the differential pressure across the fabric collector, which provides a reasonable assurance of ongoing compliance with emission limitations stated in this permit. The initial parameters shall be established using manufacturer/supplier recommendations and by correlating with opacity readings and source test results. These parameters shall be reviewed annually and revised if necessary based on PM<sub>10</sub> source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
8. Combustion air supply lines and auxiliary burner natural gas supply line shall be equipped with operational volumetric flow-rate indicators. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Selective non-catalytic reduction ammonia injection system shall be equipped with operational ammonia volume flow-rate indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Fabric collector exhaust stack shall be equipped with recording continuous monitors for opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO, O<sub>2</sub>, and flue gas volume flow-rate per Rule 1081. [40 CFR Part 64, and District Rules 2201 and 1081] Federally Enforceable Through Title V Permit
11. Continuous monitoring system for flue gas volume flow-rate shall meet E.P.A. monitoring performance specifications appearing in 40 CFR Part 52 appendix E. [40 CFR 60 Subpart Db and District Rule 4001] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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12. Only PUC quality natural gas, biomass, sand, limestone, ammonia, air, sodium bicarbonate ( $\text{NaHCO}_3$ ), and on-site generated dewatered cooling tower sludge shall be introduced into boiler. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
13. Wood waste includes clean, chipped wood products, plywood, wood products manufacturing wood materials, construction and demolition wood materials, and wood pallets, crates and boxes. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
14. Startup burner shall not operate when feed rate of biomass exceeds 20 tons per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Removal of ash from ash hoppers by manual means shall only be conducted during breakdown conditions or when boiler is not operating, and there shall be no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than ringelmann 1 or 20% opacity. [District Rules 4101 and 4102] Federally Enforceable Through Title V Permit
16. Limestone, sodium bicarbonate ( $\text{NaHCO}_3$ ) and/or onsite generated cooling tower sludge, shall be injected into boiler at a rate in pounds per ton of biomass fuel introduced into boiler which results in compliance with the SOx emission limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Ammonia shall be injected into boiler at a rate, in pounds per ton of biomass fuel introduced into boiler, which results in compliance with the NOx emission limitation. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Ammonia injection rate shall be controlled to prevent the emission of free ammonia in excess of 20 ppmv or such level as required to prevent detectable odors or a maximum concentration of 50 ppmv at ground level. [District NSR Rule and Rule 4102] Federally Enforceable Through Title V Permit
19. NOx and PM10 emission data shall be obtained and provided, as required by NSPS 40CFR60.48b "Emissions monitoring for particulate and nitrogen oxides". CEM data shall be provided as required by 60.48b(f). [40 CFR 60 Subpart Db and District Rule 4001] Federally Enforceable Through Title V Permit
20. Particulate matter (PM10) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.045 lb/MMBTU of filterable particulates and 14.08 lb/hr of filterable and condensable particulates. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Sulfur compound emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 23 ppmvd @ 3% O<sub>2</sub> and 12.09 lb/hr (as SO<sub>2</sub>). [District NSR Rule] Federally Enforceable Through Title V Permit
22. Oxides of nitrogen emissions (as NO<sub>2</sub>), except for periods of startup and shutdown as defined in this permit, shall not exceed 0.10 lb/MMBTU and 31.50 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Volatile organic compound (VOC) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.020 lb/MMBTU and 6.3 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Carbon monoxide (CO) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 183 ppmvd @ 3% CO<sub>2</sub> and 44.10 lb/hr. On days in which a startup and shutdown of this unit occurs, CO emissions shall not exceed 500 lb/hr in any single hour during the startup or shutdown. [District NSR Rule & 4352, 5.1] Federally Enforceable Through Title V Permit
25. Emission rates shall not exceed any of the following: PM10: 337.9 lb/day, SOx (as S0<sub>2</sub>): 290.2 lb/day, NOx (as NO<sub>2</sub>): 756.0 lb/day, VOC: 151.2 lb/day or CO (except during days of refractory cure or on days with startup and shut operations): 1058.4 lb/day. On days in which a startup and shutdown of this unit occurs, CO emissions shall not exceed 3,500 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
26. On days of refractory cure using startup burner, CO emissions shall not exceed 6,240 lb/day and heat input to boiler shall not exceed 3,206.6 MMBTU/day. CO emission limit on each refractory cure day shall be determined by records of fuel use, fuel heat content, and resulting maximum daily heat rate. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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27. On days of refractory cure using four 10 MMBtu/hr refractory cure heaters, heat input shall not exceed 960 MMBtu/day to the refractory cure heaters. Refractory burner emission rates shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, SOx (as SO2): 0.00285 lb/MMBtu, NOx (as NO2): 0.1 lb/MMBtu, VOC: 0.0055 lb/MMBtu or CO: 0.3 lb/MMBtu. Daily records of fuel use, fuel heat content, and resulting daily heat rate input shall be kept, to demonstrate compliance with emission limits during refractory curing. [District NSR Rule] Federally Enforceable Through Title V Permit
28. This boiler shall not be operated under refractory cure conditions for more than 6 days per year. Refractory cure shall not be performed on more than one unit (Boiler #1, S-75-6 or Boiler #2, S-75-11) at any time. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Permittee shall notify the District in writing of the start date and end date of operating under refractory cure and alternate CO emission limit condition. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Excess emissions of NOx, SOx, and CO as shown by the continuous monitoring system shall be defined as any 24 hour period during which the average emissions of NOx, SOx, or CO exceed any emissions limit, except as noted in this permit on days of refractory cure or on day(s) in which a startup or shutdown of this unit occurs. [District NSR Rule] Federally Enforceable Through Title V Permit
31. "Startup" is the period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. [District NSR Rule & 4352, 5.3.2] Federally Enforceable Through Title V Permit
32. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. [District NSR Rule] Federally Enforceable Through Title V Permit
33. "Shutdown" is the period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 & 75%. [District NSR Rule & 4352, 5.3.1] Federally Enforceable Through Title V Permit
34. "Steady state" load is defined as the operational conditions that generate electrical power at + or - one (1) megawatt from the target load established and documented by control room log book. [District NSR Rule] Federally Enforceable Through Title V Permit
35. During startup and shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201 & 4352, 5.3.3] Federally Enforceable Through Title V Permit
36. Annual audits of continuous monitors shall be conducted by independent laboratory in accordance with E.P.A. guidelines, shall be witnessed by District and results shall be submitted to District within 60 days of such audit pursuant to Rule 1080. [District Rule 1080] Federally Enforceable Through Title V Permit
37. Upon District request, a District approved 25 ton representative sample of biomass fuel in the reclaim pile shall be sorted. [District Rule 4102]
38. Data collected during sorting of 25 ton sample of biomass fuel shall be in pounds of material per ton of biomass, by category as identified in fuel contamination limit condition, and official test results and field data shall be submitted within 30 days after collection. [District Rule 4102]
39. District-witnessed emission sample collection for PM10, SOx, NOx and CO (except CO during designated refractory cure days) shall be conducted by an independent testing laboratory annually 60 days prior to permit anniversary date of August 31, or within 60 days of start-up if the unit did not operate between July 3 and August 31. [District Rule 1081 & 4352, 6.3.1] Federally Enforceable Through Title V Permit
40. Source testing for the following parameters shall be conducted using the stated test methods: NOx - EPA Method 7 or ARB Method 100, CO - EPA Method 10 or ARB Method 100, CO2 - EPA Method 3 or ARB Method 100, O2 - EPA Method 3 or ARB Method 100, SO2 - EPA Method 6 or ARB Method 100, PM10 - EPA Methods 201A & 202 or Method 5, Stack Gas Flow Rate - EPA Method 2, Moisture Content - EPA Method 4, Ammonia - BAAQMD ST1B, & Fuel Heating Value - ASTM Method D2015-85 or E711. [District Rules 2201 & 4352, 6.4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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41. Official test results and field data from compliance testing shall be submitted within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
42. NO<sub>x</sub> emissions shall not exceed 275,920 lb in any 12 month period. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Permittee shall project and use the proper mix of fuels to ensure that actual emissions from boiler S-75-11 are offset with creditable biomass on a quarterly basis. Quarterly NO<sub>x</sub> emission offsets required from creditable biomass = (Actual quarterly emissions) - (604.8 lb/day x days/qtr). [District NSR Rule] Federally Enforceable Through Title V Permit
44. Open-burning emission factors used to determine the quantity of offsets available from the diversion of biomass from open-burning are listed in the attachment "Open Burn Emission Factors" (District policy SSP-2005). [District NSR Rule] Federally Enforceable Through Title V Permit
45. If quarterly actual NO<sub>x</sub> emissions from boiler S-75-11 are greater than zero, the emission reduction credit from creditable biomass fuel shall be calculated for NO<sub>x</sub> using the following formula:  $P_q = x * [\sum_{j=1}^n (B_j) * (EF_j) * (HBF_j) * (QDF_{jq})]$  where:  $P_q$  = Pollutant offset credit in lb/qtr = sum of NO<sub>x</sub> emissions from ag waste credit < 15 miles + NO<sub>x</sub> emissions > 15 miles from facility.  $q$  = calendar quarter,  $x$  = 0.5 for biomass originating > 15 miles and 0.833 for < 15 miles.  $j$  = each creditable biomass type.  $B$  = tons of biomass type ( $j$ ) used per quarter.  $EF$  = emission factor for particular biomass (from SSP-2005).  $HBF_j$  = fraction of biomass type ( $j$ ) that has been demonstrated to have historically open field burned (for orchard prunings  $HBF=0.96$ , for other biomass a District approved  $HBF$  factor must be used).  $QDF_{jq}$  = Quarterly distribution factor - fraction of burning of biomass ( $j$ ) which occurs in calendar quarter ( $q$ ). For orchard prunings  $QDF = Q1: 0.251, Q2: 0.275, Q3: 0.149, Q4: 0.325$ . [District NSR Rule] Federally Enforceable Through Title V Permit
46. Permittee shall maintain accurate records of continuous emissions monitoring (CEM) results, dates of occurrences and duration of start-up, shutdown, malfunction, performance testing, evaluations, calibrations, checks, adjustments and maintenance, and daily records of natural gas fuel usage. [District Rule 1080 and District NSR Rule] Federally Enforceable Through Title V Permit
47. Daily records for each load of creditable biomass received shall be maintained which include the geographic origin (for applicability of distance offset ratio), date, weigh ticket number, supplier name, fuel type, tons received, the offset ratio for the load of biomass, and the amount of offset credit (in pounds of NO<sub>x</sub>) attributable to each load of biomass. Records shall include certifications that any creditable biomass for which offset credit is claimed has historically been open burned in the San Joaquin Valley air basin. [District NSR Rule] Federally Enforceable Through Title V Permit
48. Permittee shall submit to the District a quarterly report accounting for the tonnage of agricultural waste eliminated from open field burning and used as plant fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
49. Quarterly report of agricultural waste eliminated from open field burning (to offset NO<sub>x</sub> emissions) used as fuel at facility shall document creditable ag waste fuel receipt quantities, if fuel originates > 15 miles from facility, offset credit ratios, emission factors used, and summary of the resultant emissions offsets provided using "the procedure", and shall be submitted to the District within 30 days of the end of the quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
50. Quarterly report, of agricultural waste eliminated from open field burning used for the purpose of providing required NO<sub>x</sub> offsets, shall document historical biomass fraction (HBF) and quarterly distribution factor (QDF) for each biomass fuel used to calculate credit. For orchard prunings  $HBF = 0.96$  and  $QDF =$  as stated in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
51. This PTO involved a NO<sub>x</sub> BACT re-determination, which was based on the argument that relaxing the NO<sub>x</sub> BACT limit would eliminate optically dense visible emissions. Should optically dense visible emissions continue or recur, this BACT re-determination shall be nullified, and the NO<sub>x</sub> BACT emission limit shall revert to 0.08 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
52. FACILITIES OPERATION: All equipment, facilities, and systems shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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53. **MALFUNCTION:** The Director of the Air and Toxics Division shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit. In addition, the Director of the Air and Toxics Division shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of the permit or of any law or regulations which such malfunction may cause. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
54. **RIGHT TO ENTRY:** The Regional Administrator, the head of the State Air Pollution Control Agency, the head of the responsible local air pollution control agency, and/or their authorized representatives, upon the presentation of credentials, shall be permitted: A) to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit; B) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; C) to inspect any equipment, operation, or method required in this permit; D) to sample emissions from the source. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
55. **TRANSFER OF OWNERSHIP:** In the event of any changes in control or ownership, this permit shall be binding on all subsequent owners and operators. The applicant shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the Regional Administrator and the State and local Air Pollution Control Agency. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
56. **SEVERABILITY:** The provisions of this permit are severable, and, if any provisions of this permit is held invalid, the remainder of this permit shall not be affected thereby. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
57. **OTHER APPLICABLE REGULATIONS:** The owner and operator shall operate the stationary source in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, state and local air quality regulations. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
58. **AIR POLLUTION CONTROL EQUIPMENT:** Limestone shall be injected directly into the combustion chambers of the boiler as required to attain the emission limit for SO<sub>2</sub>. Based on previous operating experience, DECI shall, to the best of its ability, anticipate periods when a high sulfur biomass fuel and/or inherently low calcium bearing biomass fuel is utilized such that the addition of limestone is required to attain the emission limits. A SNCR system utilizing ammonia injection shall be incorporated within the boilers. Ammonia shall be injected continuously during all periods of operation at a rate which results in compliance with the NO<sub>x</sub> emission limits. It is ultimately, DECI's burden to maintain SO<sub>2</sub> and NO<sub>x</sub> emissions below the limits given in this permit during all periods of operations independent of biomass fuel type and fuel availability. Biomass fuel type, availability, and/or composition can not be utilized as a rationale for excess emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
59. **PERFORMANCE TESTS:** At times as specified by EPA, DECI shall conduct performance tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> and furnish the Kern County Air Pollution Control District and EPA a written report of the results of such tests. The tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted on an annual basis and at the maximum operating capacity of the facility being tested. Upon written request (Attn: A-3-3) from DECI, EPA may approve the conducting of performance tests at a lower specified production rate. Also, upon written request from DECI, EPA may approve the deletion of a specific annual test for the combustion unit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
60. **PERFORMANCE TEST METHODS:** Performance tests for the emissions of SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted and the results reported in accordance with the test methods set forth in 40 CFR 60, Part 60.8 and Appendix A and 40 CFR Part 51 Appendix M. The following test methods shall be used: a) Performance tests for the emission of SO<sub>2</sub> shall be conducted using EPA Methods 1-4, and b) Performance tests for the emissions of NO<sub>x</sub> shall be conducted using EPA Methods 1-4, and c) Performance tests for the emissions of PM<sub>10</sub> shall be conducted using EPA Method 201(a), and d) Performance tests for the emissions of CO shall be conducted using EPA Methods 1-4 and 10. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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61. PERFORMANCE TEST NOTICE: EPA (Attn: A-3-3) shall be notified in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. such prior approval will minimize the possibility of EPA rejection of test results for procedural deficiencies. In lieu of the above mentioned test methods, equivalent methods may be used with prior written approval from EPA. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
62. PERFORMANCE TEST ACCOMMODATIONS: For performance test purposes, sampling ports, platforms, and access shall be provided by DECI on the combustion exhaust system in accordance with 40 CFR 60.8(e). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
63. SO<sub>2</sub> EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere SO<sub>2</sub> in excess of the more stringent of 10.4 lb/hr or 18.8 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 249.6 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
64. NO<sub>x</sub> EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere NO<sub>x</sub> (asNO<sub>2</sub>) in excess of the more stringent of 25.2 lb/hr or 63 ppmvd @ 3% O<sub>2</sub> (24-hour rolling average) or 604.8 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01 and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
65. PM<sub>10</sub> EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere filterable PM<sub>10</sub> in excess of the more stringent of 7.0 lb/hr or 0.01 gr/dscf @ 12% CO<sub>2</sub> (3-hour rolling average) or 169 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
66. CO EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere CO in excess of the more stringent of 44.1 lb/hr or 183 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 1058.4 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
67. OPACITY: Boiler shall not discharge or cause the discharge into the atmosphere any gases with an opacity in excess of 20% except for aggregate periods of less than 3 minutes in any one hour period from each of the stacks venting each of the fluidized bed combustion units. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
68. BOILER HEAT INPUT: DECI shall continuously record the steam output and the steam temperature and pressure from the boiler; also, DECI shall determine the boiler efficiency annually. The heat input, as determined from the boiler efficiency and steam production rate, shall not exceed 315 MMBtu/hr. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
69. OFFSET RESTRICTION: If the emission limit for any of the above pollutants (SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub>, and CO) is revised, the difference between the pollutant emission limit set forth above and the lower pollutant emission limit shall not be allowed as an emission offset for future construction or modification. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
70. CONTINUOUS MONITORING: DECI shall maintain and operate a continuous monitoring system to measure stack gas NO<sub>x</sub>, CO, SO<sub>x</sub>, O<sub>2</sub> and Opacity in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR 60.13 and 40 CFR 60, Appendix B, Performance Specifications 1,2,3,and 4). [40 CFR Part 64, District Rule 4001 and PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
71. CONTINUOUS MONITORING: DECI shall maintain and operate a continuous monitoring system to measure stack gas volumetric flow rates in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR Part 60, Appendix B, Performance Specification 6). [District Rule 4001, PSD ATC SJ 90-01] 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.



72. CONTINUOUS MONITORING REPORT: DECI shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. b) Specific identification of each period of excess emissions that occurs during start-ups, shutdowns, and malfunctions of any of the boilers. The nature and cause of any malfunction (if known) and the corrective action take or preventative measures adopted shall also be reported. c) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments. d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
73. CONTINUOUS MONITORING: Excess emissions shall be defined as any three-hour period during which the average emissions of PM10, SO2, and/or CO, as measured by the continuous monitoring system or by a performance test, exceeds the maximum emission limits. [District Rule 2201 and PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
74. CONTINUOUS MONITORING: Excess emissions shall be defined as any 24-hour period during which the average emissions of NOx, as measured by the continuous monitoring system or by a performance test, exceeds the NOx maximum emission limit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
75. CONTINUOUS MONITORING: Excess emissions shall be defined as any three-minute period during which the average opacity as measured by the continuous monitoring system exceed the maximum emission limit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
76. CONTINUOUS MONITORING: Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limits for the purposes of this permit except for SO2 and CO 3-hour emission limits and the opacity minute limit during normal startup or shutdown: (1) Startup shall be considered that period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. (2) Shutdown shall be considered that period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 and 75%. (3) Daily emission limits apply at all times except during refractory cure. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
77. CONTINUOUS MONITORING: DECI shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
78. FUEL USE: Only PUC quality natural gas, biomass, sand, limestone, ammonia, air and onsite generated, dewatered cooling tower sludge shall be fired in boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
79. FUEL USE: Biomass fuel sulfur shall not exceed 0.90% dry weight and biomass fuel nitrogen shall not exceed 2.5% dry weight. [District NSR Rule, PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
80. FUEL USE: Biomass means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removals, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips and wood waste, including clean, chipped wood products, plywood, particle board, fiberboard and wood products manufacturing wastes, wood based construction demolition materials, pallets, crates and boxes. Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal solid waste. [District Rules 2201 and 4102, PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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81. FUEL USE: Additional biomass fuels may be administratively appended to this list upon a written request by the permittee to add an unlisted fuel, and provided the permittee can demonstrate that emissions of affected pollutants will not increase and that the boiler is designed to accommodate such fuel without physical or operational modifications. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
82. FUEL USE: Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal waste. In addition, contamination of the biomass fuel shall not exceed 0.04% by weight plastics and 0.62% by weight of metals, plastics, paper, painted wood, preservative treated wood and nonwood roofing materials (except asbestos). [District Rule 4102, PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
83. FUEL USE: The permittee shall continuously record the steam output from the boiler and shall annually determine boiler efficiency from the results of boiler efficiency tests. From these parameters the heat input to the boiler (on a 365 day rolling average) shall be determined and recorded. The heat input as determined from the boiler efficiency and steam production rate shall not exceed 315 MMBtu/hr. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
84. FUEL USE: The boiler shall not consume more than 142,857.1 scf/hr of natural gas with a higher heating value of 1,050 Btu/scf through the inbed and overbed burners. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
85. FUEL USE: The boiler shall not consume more than 14,285.7 scf/hr of natural gas with a higher heating value (HHV) of 1,050 Btu/scf through the startup burner. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
86. FUEL USE: The startup burner shall only be used for startup purposes. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
87. FUEL USE: The total heat input into the boiler shall not exceed 315 MMBtu/hr (HHV) when firing with both biomass and natural gas. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
88. NEW SOURCE PERFORMANCE STANDARDS: The boiler shall meet all applicable requirements of 40 CFR 60 Subparts A and Db. [PSD ATC SJ 90-01, District Rule 4001] Federally Enforceable Through Title V Permit
89. AGENCY NOTIFICATIONS: All correspondence as required by this Operating Permit shall be forwarded to the following addresses: 1) Director, Air and Toxics Division (Attn: A-3-3), EPA Region 9, 75 Hawthorne St, San Francisco, CA 94105; 2) Chief, Stationary Source Division, California Air Resources Board, PO Box 2815, Sacramento, CA 95812; 3) Assistant Air Pollution Control Officer, SJVUAPCD, 2700 "M" Street, Suite 275, Bakersfield, CA 93301. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
90. The owner/operator shall operate, maintain and calibrate Continuous Emission Monitoring system pursuant to the requirements of 40 CFR 60.7 (c) and 60.13. CEMs must also satisfy the Performance Specifications of 40 CFR 60 Appendix B and the Relative Accuracy Test Audit of Appendix F. [40 CFR Part 64, District Rule 4352, 5.5] Federally Enforceable Through Title V Permit
91. The owner/operator shall maintain an operating log that includes the type and quantity of fuel used and the hhv of each fuel as determined by District Rule 4352, section 6.4 (as amended 05/18/06), or as certified by a third party fuel supplier. [District Rule 4352, 6.2] Federally Enforceable Through Title V Permit
92. The compliance determination shall not be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352, 6.3.3] Federally Enforceable Through Title V Permit
93. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
94. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
95. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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96. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
97. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
98. During each day of operation, the permittee shall record the pressure drop of the fabric filter, and compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
99. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
100. Particulate Matter emissions shall not exceed 10.0 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
101. Records of startup and shutdown times and startup and shutdown emissions shall be maintained [District Rule 2201] 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:** S-75-12-3

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

5,236 GALLON LIMESTONE RECEIVING & STORAGE SILO (UNIT #2) INCLUDING VIBRATING BIN BOTTOM, PNEUMATIC CONVEYING SYSTEM WITH 25 HP MOTOR AND 162 SQUARE FOOT BIN VENT FILTER WITH 1 HP EXHAUST FAN AND PNEUMATIC PULSE JET BAG SHAKING SYSTEM

## **PERMIT UNIT REQUIREMENTS**

1. Storage silo shall vent only through bin vent filter. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Bin vent filter shall have a maximum air to cloth ratio of 5 ft/min and a minimum filter area of 162 square feet. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Bin vent filter shall be equipped with an operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Only crushed limestone shall be handled. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
6. There shall be no emissions in excess of 5% opacity from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Silo shall not operate more than 7 hours/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. PM-10 emissions shall be measured by District-witnessed sample collection by independent testing firm upon detection of visible emissions. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
9. Permittee shall keep records of amounts and size of limestone received and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Records of dust collector maintenance, hours of operation, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

14. Operator shall record the daily hours of operation for this unit. [District Rule 2520, 9.4.2] 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:** S-75-13-3

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

45,886 GALLON SAND STORAGE SILO (UNIT #2) INCLUDING PNEUMATIC CONVEYING SYSTEM AND BIN VENT FILTER WITH 162 SQUARE FEET OF FILTERING AREA, 1.0 HP EXHAUST FAN AND PNEUMATIC PULSE JET BAG SHAKING SYSTEM

## PERMIT UNIT REQUIREMENTS

1. Storage silo shall vent only through bin vent filter. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Bin vent filter shall have a maximum air to cloth ratio of 5 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Bin vent filter shall have a minimum filter area of 162 square feet. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Bin vent filter shall be equipped with an operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
6. There shall be no emissions in excess of 5% opacity from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Silo shall not operate more than 7 hours/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. PM-10 emissions shall be measured by District-witnessed sample collection by independent testing firm upon detection of visible emissions. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
9. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
10. Permittee shall keep records of amounts and size of sand received and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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14. Records of dust collector maintenance, hours of operation, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Operator shall record the daily hours of operation for this unit. [District Rule 2520, 9.4.2] 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:** S-75-16-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

EMERGENCY FIRE WATER PUMP POWERED BY 244 HP CUMMINS DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND POSITIVE CRANKCASE VENTILATION

## PERMIT UNIT REQUIREMENTS

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1. 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] Federally Enforceable Through Title V Permit
2. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing (unless voids UL or Fire Marshall certification). [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [Kern County Rule 407, District Rules 2201 and 4801, 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
5. If the engine exhibits visible emissions greater than 5% opacity, District-witnessed compliance testing for particulate matter emissions shall be conducted by an independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702] Federally Enforceable Through Title V Permit
8. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702, 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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10. The permittee shall maintain records of hours of operation and of the sulfur content of the diesel fuel used and shall make such records readily available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-17-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

EMERGENCY ELECTRICAL GENERATOR POWERED BY 830 BHP DETROIT DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND POSITIVE CRANKCASE VENTILATION

## PERMIT UNIT REQUIREMENTS

1. 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] Federally Enforceable Through Title V Permit
2. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing (unless voids UL or Fire Marshall certification). [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [Kern County Rule 407, District Rules 2201 and 4801, 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
5. If the engine exhibits visible emissions greater than 5% opacity, District-witnessed compliance testing for particulate matter emissions shall be conducted by an independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
9. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
10. During periods of operation for maintenance, testing, and required regulatory purposes, 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of hours of operation and of the sulfur content of the diesel fuel used and shall make such records readily available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-18-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

EMERGENCY ELECTRICAL GENERATOR POWERED BY 1106 BHP CATERPILLAR DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND CRANKCASE VENT CARTRIDGE FILTER

## PERMIT UNIT REQUIREMENTS

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1. 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] Federally Enforceable Through Title V Permit
2. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing (unless voids UL or Fire Marshall certification). [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [Kern County Rule 407, District Rules 2201 and 4801, 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
5. If the engine exhibits visible emissions greater than 5% opacity, District-witnessed compliance testing for particulate matter emissions shall be conducted by an independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
9. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
10. During periods of operation for maintenance, testing, and required regulatory purposes, 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of hours of operation and of the sulfur content of the diesel fuel used and shall make such records readily available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-19-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

UNIT ONE: 28,000 GALLON PER MINUTE CAPACITY, WOODEN, INDUCED DRAFT COUNTERFLOW COOLING TOWER INCLUDING FOUR 2-SPEED FAN MOTORS AND TWO MAIN CIRCULATION WATER PUMPS

## PERMIT UNIT REQUIREMENTS

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1. No hexavalent chromium containing compounds shall be added to cooling tower circulation water. [District Rule 7012] Federally Enforceable Through Title V Permit
2. Total electric motor horsepower for this cooling tower shall not exceed 1440 HP. [District NSR Rule] 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:** S-75-20-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

UNIT TWO: 18,000 GALLON PER MINUTE CAPACITY, WOODEN, INDUCED DRAFT COUNTERFLOW COOLING TOWER INCLUDING TWO 2-SPEED FAN MOTORS, TWO MAIN CIRCULATION WATER PUMPS, AND TWO COMPONENT COOLING WATER CIRCULATION PUMPS

## PERMIT UNIT REQUIREMENTS

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1. No hexavalent chromium containing compounds shall be added to cooling tower circulation water. [District Rule 7012] Federally Enforceable Through Title V Permit
2. Total electric motor horsepower for this cooling tower shall not exceed 1200 HP. [District NSR Rule] 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:** S-75-21-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** 25 **TOWNSHIP:** 25 **RANGE:** 25

**EQUIPMENT DESCRIPTION:**

EMERGENCY FUEL FEED SYSTEM INCLUDING 12'X5'X8' FUEL RECEIVING HOPPER SERVING UNITS 1 & 2, 48' SCREW CONVEYOR, AND WATER/SURFACTANT SPRAYS AT HOPPER RIM AND MATERIAL TRANSFER POINTS FROM SCREW CONVEYOR TO BELT CONVEYORS BC-8 AND BC-15

## PERMIT UNIT REQUIREMENTS

1. Operation shall be equipped with 12' by 5' by 8' receiving hopper, 48' long screw conveyor, and water/surfactant sprays at hopper rim and material transfer points from screw conveyor to belt conveyors BC-8 and BC-15. [District NSR Rule] Federally Enforceable Through Title V Permit
2. There shall be no visible emissions of 5% opacity or greater from loading of the hopper and material transfer points. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Fabric collector #1 shall be operated whenever material is being transferred from emergency fuel system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Water/surfactant sprays shall be in operation whenever emergency fuel system is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emergency fuel system throughput shall not exceed 35 tons/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall maintain records of emergency fuel system throughput and shall make such records readily available for District inspection upon request. [District NSR Rule & Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] 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 Permits

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# San Joaquin Valley Air Pollution Control District

**FACILITY:** S-75-0-1

**EXPIRATION DATE:** 08/31/2007

## **FACILITY-WIDE REQUIREMENTS**

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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; Kern County Rule 110] 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; Kern County Rule 110] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: COVANTA DELANO INC  
Location: 31500 POND RD, DELANO, CA 93215  
S-75-0-1: Sep 1 2011 4:20PM -- BRARG

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with Section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and Kern County Rule 110] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to District Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves ozone-depleting refrigerants in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, or extraction 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 and 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 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 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permit shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. On December 31, 2002, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
40. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan, and comply with all the requirements of Program 1, 2, or 3 when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
41. Facility shall comply with California Health and Safety Code Sections 44300 through 44384. [District Rule 4102 and California Health and Safety Code]
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All roads and roadways used by equipment associated with operation of boiler shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Particulate matter collected by fabric collectors shall be accumulated in closed containers and disposed of in a manner preventing entrainment in atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
45. Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods pursuant to Rule 1081. [District Rule 1081] 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:** S-75-1-8

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

FUEL RECEIVING, SCREENING & CONVEYING OPERATION INCLUDING TWO 60 TON CAPACITY TRUCK TIPPER PLATFORMS #1 AND #2 EQUIPPED WITH FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 175 TON/HR FUEL TRANSFER CONVEYOR #1 WITH BELT SCALE AND FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-1 TO DS-1, BC-9 TO BC-2, HOG-1 TO BC-2; STATION #2 SERVES POINTS BC-3 & BC-5), AND HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADERS

## **PERMIT UNIT REQUIREMENTS**

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1. Operation shall include ventilation system and fabric collector #2, with a minimum of 5,002 sq.ft. filter area and 100 hp exhaust fan, serving truck tippers, fuel receiving hoppers and inlets to the fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fabric collector #2 shall include 5 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall include belt type magnetic separator and magnetic separator take away conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operation shall include disk type scalping screen and swing hammer type hog, both with foam dust suppression and both vented to fabric collector #4. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operation shall include ventilation system and fabric collector #4, with minimum of 3,674 sq. ft. filter area and 60 hp exhaust fan (shared with S-75-5), serving disk type scalping screen, swing hammer type hog, and discharge of fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fabric collector #4 shall include 3 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Operation shall include 186 ton/hr capacity hog outfeed conveyor #2 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Operation shall include 186 ton/hr capacity fixed stacker conveyor #3 with operational foam dust suppression, two position diverter gate, and telescopic spout with dust pick-up shroud. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Operation shall include 186 ton/hr capacity stacker infeed conveyor #4, and 186 ton/hr capacity radial stacker conveyor #5 with telescopic spout with dust pickup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Operation shall include ventilation system with fabric collector #3 serving equipment associated with the 186 ton/hour hog, fixed stacker and infeed conveyor listed above (fixed stacker conveyor #3, diverter gate, telescopic spout, stacker infeed conveyor #4, radial stacker conveyor #5 and the head of hog outfeed conveyor #2), with a minimum of 3,263 sq.ft. filter area and 125 hp exhaust fan. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fabric collector #3 shall include 3 hp blower motor, rotary valve and auger. [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.

12. There shall be no visible emissions of 5% opacity or greater from truck tipper receiving hopper ventilation pickup points. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Truck tipper receiving hopper ventilation hood and hog ventilation hoods shall provide minimum indraft velocity of 200 ft/min during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Truck tipper receiving hopper drag chain conveyor transfer point hood shall provide minimum indraft velocity of 150 ft/min during entire truck unloading and fuel transfer to take away belt conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Truck tipper area ventilation system shall be equipped with interlocks and isolation valves which directs all air flow through operating truck tipper and prevents simultaneous operation of truck tippers. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Conveyor belt ventilation hood(s) shall provide minimum indraft velocity of 500 cfm/ft of belt width during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Scalping screen ventilation hood(s) shall provide minimum indraft velocity of 50 ft/min during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Truck tipper fabric collector #2 shall have minimum filter area of 5,002 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Scalping screen/hog area ventilation system shall be equipped with isolation valve which prevents air flow from primary screen and hog when this equipment is not in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Scalping screen/hog area fabric collector #4 shall have minimum filter area of 3,674 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Stacker/reclaimer area fabric collector #3 shall have minimum filter area of 3,263 sq. ft. and maximum air-to-cloth ratio of 8.2 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Each fabric collector shall be equipped with adjustable automatic reverse pulse filter cleaning mechanism and operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods pursuant to Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Variable height radial stacker, auxiliary stacker and reclaimers shall be ventilated to fabric collector, and discharge from stacker spouts shall be maintained as close as possible to top of storage pile. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Radial and auxiliary stacker conveyors BC3 and BC5 shall be equipped with foam injection nozzles which shall be operated as needed, to ensure dust emissions have visible emissions less than or equal to 20% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
27. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,200 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Deliveries of fuel shall not exceed 144 truck loads per day. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Drag chain transfer, point hood ventilation system and fabric collector shall operate whenever material is being transferred out of receiving bin. [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.

30. There shall be no visible emissions of 5% opacity or greater from truck tipper receiving hopper during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Truck tipper receiving hopper, ventilation hood system and fabric collector #2 shall be operated whenever material is being transferred into the hopper. [District NSR Rule] Federally Enforceable Through Title V Permit
32. There shall be no visible emissions of 5% opacity or greater from conveyor transfer points, scalping screen, and hog enclosures, including inlet and outlet openings. [District NSR Rule] Federally Enforceable Through Title V Permit
33. Scalping screen/hog area fabric collector #4 shall be operated whenever material is being transferred from fuel receiving operations or storage pile to boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Stacker/reclaimer area fabric collector #3 shall be operated whenever material is being transferred to or from storage piles. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Auxiliary stacker shall not operate when radial stacker is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Fuel transfer conveyor shall be fully enclosed and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Radial stacker telescoping discharge spout height shall be continuously adjusted to minimize material drop distance to pile. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Material to stacker shall contain no more than 3% by weight of fines capable of passing through 200 mesh screen. [District NSR Rule] Federally Enforceable Through Title V Permit
39. Any stored fuel which is burning shall be immediately segregated and extinguished. [District Rule 4102 and District NSR Rule] Federally Enforceable Through Title V Permit
40. Records of types, amounts and origins (including distance from facility, copies of all purchase contracts, # of trucks, etc.) of offset fuels received shall be maintained and made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
41. Air flow to fabric collector #2 shall not exceed 40,000 cfm and Particulate (PM-10) emissions from fabric filter #2 shall not exceed 0.0045 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Air flow to fabric collectors 3 and 4 shall not exceed 20,000 and 30,000 cfm respectively, and Particulate (PM-10) emissions from fabric collectors shall not exceed 0.004 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Fugitive particulate (PM-10) emissions from fuel storage piles shall not exceed 1.32 lb PM-10/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Particulate matter collected by fabric collector shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Wood waste delivery trucks shall remain covered during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
46. Operator shall record the daily number of fuel delivery truck loads. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
47. Operator shall record percentage of fines (passing #200 screen) in the material to the stacker. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
48. Visible emissions from fabric collectors shall be inspected monthly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.



49. Visible emissions from truck tipper receiving hopper ventilation pickup points, conveyor transfer points, scalping screens, and hog enclosures (including inlet and outlet openings) shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
50. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
51. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
52. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
53. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
54. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404] 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:** S-75-3-5

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

4,400 GALLON LIMESTONE STORAGE SILO (UNIT #1), WITH VAPOR SPACE TIED IN COMMON WITH SAND SILO PTO 75-4, INCLUDING BIN VENT FILTER WITH 95 SQUARE FOOT FILTER AREA, 1 HP EXHAUST FAN, 1/4 HP BAG SHAKER MOTOR, AND PRODUCT CONVEYING BLOWER.

## PERMIT UNIT REQUIREMENTS

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1. Storage silo shall vent through bin vent filters located on sand storage silo S-75-3 and limestone storage silo S-75-4. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Bin vent filters located on PTO S-75-3 and S-75-4 shall both be in operation and utilized when silo is being filled. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Limestone bin vent filter shall have a maximum air to cloth ratio of 8.54 ft./min and minimum filter area of 95 square feet. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Bin vent filter shall be equipped with mechanical shaker mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Bin vent filter shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Only crushed limestone shall be handled. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
8. There shall be no emissions in excess of 5% opacity from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Silo shall not receive more than 25 tons/day of product and particulate matter (PM10) emissions shall not exceed 0.024 lbs/ton loaded. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Permittee shall keep records of amounts and size of limestone received and make such records readily available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Permittee shall perform a complete vent filter inspection on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

13. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404] 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:** S-75-4-5

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

65,828 GALLON SAND STORAGE (UNIT # 1) SILO, WITH VAPOR SPACE TIED COMMON WITH LIMESTONE SILO PTO S-75-3, INCLUDING BIN VENT FILTER WITH 120 SQ.FT. FILTER AREA, 1 HP EXHAUST FAN AND 1/4 HP BAG SHAKER MOTOR.

## PERMIT UNIT REQUIREMENTS

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1. Storage silo shall vent through bin vent filters located on sand storage silo S-75-3 and limestone storage silo S-75-4. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Bin vent filters located on PTO S-75-3 and S-75-4 shall both be in operation and utilized when silo is being filled. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Sand storage silo bin vent filter shall have a maximum air to cloth ratio of 8 ft./min and minimum filter area of 120 square feet. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Bin vent filter shall be equipped with mechanical shaker mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Bin vent filter shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
7. There shall be no emissions in excess of 5% opacity from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Silo shall not receive more than 25 tons/day of product and particulate matter emissions (PM10) shall not exceed 0.024 lbs/ton loaded. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Permittee shall keep records of amounts and size of limestone received for a period of five years and make such records readily available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Permittee shall perform a complete vent filter inspection on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

13. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404] 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:** S-75-5-8

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

FUEL RECLAMATION, CONVEYING AND SCREENING OPERATION INCLUDING 45 TON/HR TRAVELING VARIABLE HEIGHT FUEL RECLAIMER WITH WATER SPRAY SYSTEM, RECLAIMER FEED TABLE, RECLAIMER CONVEYOR #6, AND AUXILIARY FUEL RECLAIM HOPPER (PHASE I) WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-9 TO BC-2, BC-10, DS-2 TO BC-8; STATION #2 SERVES TRANSFER POINTS BC-6 TO BC-7, DC-3 TO BC-7), TWO FABRIC FILTER DUST COLLECTORS (#1 AND #4) SHARED WITH PERMIT S-75-1, FABRIC FILTER DUST COLLECTOR #3, MAC 95 CYCLONE #1 AND COVERED TRUCK LOADOUT WITH WATER SPRAYS

## **PERMIT UNIT REQUIREMENTS**

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1. Operation shall include secondary feed conveyor #7 with belt scale, belt type magnetic separators, secondary disk type scalping screen, boiler feed conveyor #8, oversize conveyor #10 and distribution drag conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Operation shall include fuel abort bunker. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall include overfeed return conveyor #9 [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operation shall include fabric collector #3 (125 hp fan and 3,263 sq. ft. minimum filtering area) serving transfer point from reclaimer feed table, auxiliary fuel reclaim hopper inlet, and reclaim conveyor #6 shared with S-75-1. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operation shall include fabric collector #1 (25 hp fan and 750 sq. ft. minimum filtering area) serving head of boiler feed conveyor #8, inlet to secondary disk scalping screen and fuel abort bunker. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Operation shall include fabric collector #4 (100 hp fan and 3,674 sq. ft. min. filter area) serving discharge from conveyor #7, belt separator, inlet to fixed separator, discharge from secondary disk scalping screen, and MAC 95 cyclone #1, shared with permit S-75-1. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Material collected by MAC 95 cyclone #1 shall discharge to conveyor BC-8, or to the covered truck loadout via a screw conveyor equipped with operational water sprays at the discharge point. [District Rule 2201] Federally Enforceable Through Title V Permit
8. There shall be no emissions in excess of 5% opacity from storage pile during reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
9. There shall be no emissions in excess of 5% opacity from conveyor transfer points, scalping screen, fuel storage bin inlet and outlet. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Fabric collector #4 shall be operated whenever material is being transferred from fuel reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fabric collector #1 shall be operated whenever material is being transferred from fuel reclamation operation. [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.

12. Fuel transfer conveyors shall be fully enclosed and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Conveyor belt ventilation hoods shall be designed to provide a minimum indraft velocity of 500 cfm/ft of belt width during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Fabric collector #1 shall have a minimum filtering area of 750 sq. ft. and a air to cloth ratio of 8 ft./min. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Each fabric collector shall be equipped with automatic, adjustable, reverse pulse filter cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Each fabric collector shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Each fabric collector shall be equipped adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Particulate matter collected by fabric collectors shall be disposed of in a manner preventing entrainment in the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,200 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
20. All access roads and roadways associated with fuel reclamation operation shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Permittee shall keep accurate records of material conveyed to fuel storage bin and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Fugitive PM10 emissions from the covered truck loading operation shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The maximum emission rate of PM-10 from fabric collector #1 shall not exceed 0.21 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Particulate matter emissions from the fabric filter dust collectors listed on this permit shall not exceed 0.004 grains/dscf in concentration. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
25. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
29. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
30. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404] 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:** S-75-6-28

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

400 MMBTU/HR (32 MW) EPI FLUIDIZED BED, BIOMASS-FUELED BOILER (UNIT #1) WITH NH<sub>3</sub>, LIMESTONE, SODIUM BICARBONATE, AND SAND INJECTION, WITH BOILER EXHAUST VENTED TO FABRIC FILTER; AND FOUR 10 MMBTU/HR PORTABLE NATURAL GAS-FIRED REFRACTORY CURING HEATERS

## PERMIT UNIT REQUIREMENTS

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1. 15 MMBtu/hr natural gas-fired boiler start-up burner shall be of "low-NO<sub>x</sub>" design utilizing staged combustion principles. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Boiler shall be equipped with two model ABB steam turbines powering a 32 MW (gross) electrical generator. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Boiler shall be equipped with a sodium bicarbonate (NaHCO<sub>3</sub>) injection system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Boiler shall be equipped with sand supply/reinjection system including bucket elevator #1 discharging to boiler or sand silo with bin vent filter. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Boiler shall be equipped with fluidized bed cleanout vibrating screen, enclosed bucket elevator #2, enclosed magnetic separator and enclosed circulating vibrating screen - with all enclosed equipment vented to boiler fuel inlet chute. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fabric collector shall be equipped with an operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Combustion air supply lines and auxiliary burner natural gas supply line shall be equipped with operational volumetric flow-rate indicators. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Selective non-catalytic reduction ammonia injection system shall be equipped with operational ammonia volume flow-rate indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fabric collector exhaust stack shall be equipped with permanent stack sampling provisions (ports, platform, ladder, etc.) consistent with E.P.A. test methods and District Rule 1081 requirements. [District Rule 1081] Federally Enforceable Through Title V Permit
10. Fabric collector exhaust stack shall be equipped with recording continuous monitors for opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO, O<sub>2</sub>, and flue gas volume flow-rate per Rule 1081. [District NSR Rule and Rule 1081] Federally Enforceable Through Title V Permit
11. Continuous monitoring systems for opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO, and O<sub>2</sub>, shall meet E.P.A. monitoring performance specifications appearing in 40 CFR 60.13 and 40 CFR Appendix B, Performance Specifications 1. 2. 4. & 4A. [District Rule 4001] Federally Enforceable Through Title V Permit
12. Continuous monitoring system for flue gas volume flow-rate shall meet E.P.A. monitoring performance specifications appearing in 40 CFR Part 52 appendix E. [District Rule 4001] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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13. This facility shall comply in full with the requirements of Rule 4001 New Source Performance Standards part 60 subpart A. and subpart Db. [District Rule 4001] Federally Enforceable Through Title V Permit
14. Only PUC quality natural gas, biomass, sand, limestone, ammonia, air, sodium bicarbonate (NaHCO<sub>3</sub>), and on-site generated dewatered cooling tower sludge shall be introduced into boiler. [District NSR Rule & Rule 4102] Federally Enforceable Through Title V Permit
15. "Biomass" means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removal, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn, yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips, and wood waste. Biomass does not include material containing sewage sludge or industrial, hazardous, radioactive or municipal solid waste. [District NSR Rule & Rule 4102] Federally Enforceable Through Title V Permit
16. Wood waste includes clean, chipped wood products, plywood, wood products manufacturing wood materials, construction and demolition wood materials, and wood pallets, crates and boxes. [District NSR Rule & 4102] Federally Enforceable Through Title V Permit
17. Contamination of the biomass fuel, as delivered to the boiler, shall not exceed 0.04% by weight plastics or 0.62% by weight total of the following materials: metals, plastics, paper, painted wood, particle board, wood treated with preservatives, and non-wood roofing materials (except asbestos). [District Rule 4102]
18. Biomass fuel sulfur content shall not exceed 0.90% by weight on a dry basis. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Biomass fuel nitrogen content shall not exceed 2.50% by weight on a dry basis. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Natural gas used as fuel shall not exceed 5,691,429 std. cu. ft. per day. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Removal of ash from ash hoppers by manual means shall only be conducted during breakdown conditions or when boiler is not operating, and there shall be no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than ringelmann 1 or 20 % opacity. [District Rules 4101 & 4102] Federally Enforceable Through Title V Permit
22. Limestone, sodium bicarbonate (NaHCO<sub>3</sub>) and/or onsite generated cooling tower sludge, shall be injected into boiler at a rate in pounds per ton of biomass fuel introduced into boiler which results in compliance with the SO<sub>x</sub> emission limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Ammonia shall be injected into boiler at a rate, in pounds per ton of biomass fuel introduced into boiler, which results in compliance with the NO<sub>x</sub> emission limitation. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Ammonia injection shall be accomplished in the temperature range of 1600 to 1900 deg. F. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Ammonia injection rate shall be controlled to prevent the emission of free ammonia in excess of 20 ppmv or such level as required to prevent detectable odors or a maximum concentration of 50 ppmv at ground level. [District NSR Rule & 4102] Federally Enforceable Through Title V Permit
26. NO<sub>x</sub> and PM<sub>10</sub> emission data shall be obtained and provided, as required by NSPS 40CFR60.48b "Emissions monitoring for particulate and nitrogen oxides." CEM data shall be provided as required by 60.48b(f). [District Rule 4001] Federally Enforceable Through Title V Permit
27. Particulate matter (PM<sub>10</sub>) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.010 gr/dscf @ 12% CO<sub>2</sub> (of filterable particulate) and 17.74 lb/hr (including condensable particulate). [District NSR Rule] Federally Enforceable Through Title V Permit
28. Sulfur compound emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 23 ppmvd @ 3% O<sub>2</sub> and 15.66 lb/hr (as SO<sub>2</sub>). [District NSR Rule] Federally Enforceable Through Title V Permit
29. Oxides of Nitrogen emissions (as NO<sub>2</sub>), except for periods of startup and shutdown as defined in this permit, shall not exceed 0.10 lb/MMBtu and 40.00 lb/hr. [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.

30. Volatile Organic Compound (VOC) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.02 lb/MMBTU and 8.0 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Carbon Monoxide (CO) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 181 ppmvd @ 3% O<sub>2</sub> and 56.00 lb/hr. On days in which a startup and shutdown of this unit occurs, CO emissions shall not exceed 500 lb/hr in any single hour during the startup or shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Boiler emission rates shall not exceed any of the following: PM<sub>10</sub>: 425.8 lb/day, SO<sub>x</sub> (as SO<sub>2</sub>): 375.8 lb/day, NO<sub>x</sub> (as NO<sub>2</sub>): 960.0 lb/day, VOC: 192.0 lb/day or CO (except during days of refractory cure or on days with startup and shut operations): 1344.0 lb/day. On days in which a startup and shutdown of this unit occurs, CO emissions shall not exceed 3,500 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
33. On days of refractory cure using startup burner, CO emissions shall not exceed 7,680 lb/day and heat input to boiler shall not exceed 3,909.4 MMBtu/day. Compliance with CO emission limit on each refractory cure day shall be demonstrated by records of fuel use, fuel heat content, and resulting daily heat rate input. [District NSR Rule] Federally Enforceable Through Title V Permit
34. On days of refractory cure using 40 MMBtu/hr refractory cure heaters, heat input shall not exceed 960 MMBtu/day to the refractory cure heaters. Refractory burner emission rates shall not exceed any of the following: PM<sub>10</sub>: 0.0076 lb/MMBtu, SO<sub>x</sub> (as SO<sub>2</sub>): 0.00285 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 0.1 lb/MMBtu, VOC: 0.0055 lb/MMBtu or CO: 0.3 lb/MMBtu. Daily records of fuel use, fuel heat content, and resulting daily heat rate input shall be kept, to demonstrate compliance with emission limits during refractory curing. [District NSR Rule] Federally Enforceable Through Title V Permit
35. This boiler shall not be operated under refractory cure conditions for more than 6 days per year. Refractory cure shall not be performed on more than one unit (Boiler #1, S-75-6 or Boiler #2, S-75-11) at any time. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Permittee shall notify the District in writing of the start date and end date of operating under refractory cure and alternate CO emission limit condition. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Excess emissions for PM<sub>10</sub> shall be defined as any three hour period during which the average emissions of PM<sub>10</sub>, as measured by the continuous monitoring system or by a performance test, exceeds an emission limit. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Excess emissions for NO<sub>x</sub>, SO<sub>x</sub> and CO for the continuous monitoring system shall be defined as any 24 hour period during which the average emissions of NO<sub>x</sub>, SO<sub>x</sub> or CO exceed any emission limit, except as noted in this permit on days of refractory cure or on day(s) in which a startup or shutdown of this unit occurs. [District NSR Rule] Federally Enforceable Through Title V Permit
39. "Startup" is the period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. [District NSR Rule] Federally Enforceable Through Title V Permit
40. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. [District NSR Rule] Federally Enforceable Through Title V Permit
41. "Shutdown" is the period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 & 75%. [District NSR Rule] Federally Enforceable Through Title V Permit
42. "Steady state" load is defined as the operational conditions that generate electrical power at + or - one (1) Megawatt from the target load established and documented by control room log book. [District NSR Rule] Federally Enforceable Through Title V Permit
43. During periods of startup/shutdown emissions shall be minimized to the extent possible using good combustion practices. [District Rule 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.

44. Annual audits of continuous monitors shall be conducted by independent laboratory in accordance with E.P.A. guidelines, shall be witnessed by District and results shall be submitted to District within 60 days of such audit pursuant to Rule 1080. [District Rule 1080] Federally Enforceable Through Title V Permit
45. Compliance with biomass fuel contamination limits shall be demonstrated by sorting a District approved 25 ton representative sample of biomass fuel in the reclaim pile upon District request. [District Rule 4102]
46. Data collected during sorting of 25 ton sample of biomass fuel shall be in pounds of material per ton of biomass, by category as identified in fuel contamination limit condition, and official test results and field data shall be submitted within 30 days after collection. [District Rule 4102]
47. Compliance with PM10, SOx, NOx and CO emission sampling limits (except CO during designated refractory cure days) shall be demonstrated by District-witnessed sample collection by independent testing laboratory annually 60 days prior to August 31st permit anniversary date, or within 60 days of startup if the unit did not operate between July 3 and August 1. [District Rule 1081] Federally Enforceable Through Title V Permit
48. Source testing for the following parameters shall be conducted using the stated test methods: NOx - EPA Method 7 or ARB Method 100, CO - EPA Method 10 or ARB Method 100, CO2 - EPA Method 3 or ARB Method 100, O2 - EPA Method 3 or ARB Method 100, SO2 - EPA Method 6 or ARB Method 100, PM10 - EPA Methods 201A & 202, Stack Gas Flow Rate - EPA Method 2, Moisture Content - EPA Method 4, Ammonia - BAAQMD ST1B, & Fuel Heating Value - ASTM Method D2015-85 or E711. [District NSR Rule] Federally Enforceable Through Title V Permit
49. Official test results and field data from compliance testing shall be submitted within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
50. Permittee shall annually offset actual emissions of the following pollutant emission rates in pounds per year: PM10, 219,037; SO2, 143,883 (PM impact only); NOx 238,527; VOC 54,750; CO, 614,186 through the elimination of sufficient annual tonnage of agricultural waste diverted from open burning. [District NSR Rule] Federally Enforceable Through Title V Permit
51. Permittee shall project and use the proper mix of fuels to ensure that actual emissions from boiler S-75-6 are offset with creditable biomass on a quarterly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
52. Open-burning emission factors used to determine the quantity of offsets available from the diversion of biomass from open-burning are listed in the attachment "Open Burn Emission Factors" (District policy SSP-2005). [District NSR Rule] Federally Enforceable Through Title V Permit
53. If quarterly actual emissions from boiler S-75-11 are greater than zero, the emission reduction credit from creditable biomass fuel shall be calculated using the following formula:  $Pq = x * [\text{sum of } j=1 \text{ to } n \text{ for } (Bj) * (EFj) * (HBFj) * (QDFjq)]$  where:  $Pq$  = Pollutant offset credit in lb/qtr = sum of emissions (by pollutant) from ag waste credit < 15 miles + emissions > 15 miles from facility.  $q$  = calendar quarter,  $x = 0.5$  for biomass originating > 15 miles and 0.833 for < 15 miles.  $j$  = each creditable biomass type.  $B$  = tons of biomass type ( $j$ ) used per quarter.  $EF$  = emission factor for particular biomass (from SSP-2005).  $HBFj$  = fraction of biomass type ( $j$ ) that has been demonstrated to have historically open field burned (for orchard prunings  $HBF=0.96$ , for other biomass a District approved HBF factor must be used).  $QDFjq$  = Quarterly distribution factor - fraction of burning of biomass ( $j$ ) which occurs in calendar quarter ( $q$ ). For orchard prunings  $QDF = Q1: 0.251, Q2: 0.275, Q3: 0.149, Q4: 0.325$ . [District NSR Rule] Federally Enforceable Through Title V Permit
54. Permittee shall maintain accurate records of continuous emissions monitoring (CEM) results, dates of occurrences and duration of start-up, shutdown, malfunction, performance testing, evaluations, calibrations, checks, adjustments and maintenance, and daily records of natural gas fuel usage. Records required by this permit shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 1080 & NSR Rule] Federally Enforceable Through Title V Permit
55. Daily records for each load of creditable biomass received shall be maintained which include the geographic origin (for applicability of distance offset ratio), date, weigh ticket number, supplier name, fuel type, tons received, the offset ratio for the load of biomass, and the amount of offset credit (in pounds of NOx) attributable to each load of biomass. Records shall include certifications that any creditable biomass for which offset credit is claimed has historically been open burned in the San Joaquin Valley air basin. [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.

56. Permittee shall demonstrate compliance with the emission offset requirements by submitting to the District a quarterly report accounting for the tonnage of agricultural waste eliminated from open field burning and used as plant fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
57. Quarterly report of agricultural waste eliminated from open field burning used as fuel at facility shall document creditable ag waste fuel receipt quantities, if fuel originates > 15 miles from facility, offset credit ratios, emission factors used, and summary of the resultant emissions offsets provided using "the procedure", and shall be submitted to the District within 30 days of the end of the quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
58. Quarterly report, of agricultural waste eliminated from open field burning used for the purpose of providing required offsets, shall document historical biomass fraction (HBF) and quarterly distribution factor (QDF) for each biomass fuel used to calculate credit. For orchard prunings HBF = 0.96 and QDF = as stated in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
59. This PTO involved a NO<sub>x</sub> BACT re-determination, which was based on the argument that relaxing the NO<sub>x</sub> BACT limit would eliminate optically dense visible emissions. Should optically dense visible emissions continue or recur, this BACT re-determination shall be nullified, and the NO<sub>x</sub> BACT emission limit shall revert to 0.08 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
60. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
61. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
62. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
63. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
64. FACILITIES OPERATION: All equipment, facilities, and systems shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
65. MALFUNCTION: The Director of the Air and Toxics Division shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit. In addition, the Director of the Air and Toxics Division shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of the permit or of any law or regulations which such malfunction may cause. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
66. RIGHT TO ENTRY: The Regional Administrator, the head of the State Air Pollution Control Agency, the head of the responsible local air pollution control agency, and/or their authorized representatives, upon the presentation of credentials, shall be permitted: A) to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit; B) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; C) to inspect any equipment, operation, or method required in this permit; D) to sample emissions from the source. [PSD ATC SJ 90-01] 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.

67. **TRANSFER OF OWNERSHIP:** In the event of any changes in control or ownership, this permit shall be binding on all subsequent owners and operators. The applicant shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the Regional Administrator and the State and local Air Pollution Control Agency. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
68. **SEVERABILITY:** The provisions of this permit are severable, and, if any provisions of this permit is held invalid, the remainder of this permit shall not be affected thereby. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
69. **OTHER APPLICABLE REGULATIONS:** The owner and operator shall operate the stationary source in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, state and local air quality regulations. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
70. **AIR POLLUTION CONTROL EQUIPMENT:** Limestone shall be injected directly into the combustion chambers of the boiler as required to attain the emission limit for SO<sub>2</sub>. Based on previous operating experience, DECI shall, to the best of its ability, anticipate periods when a high sulfur biomass fuel and/or inherently low calcium bearing biomass fuel is utilized such that the addition of limestone is required to attain the emission limits. A SNCR system utilizing ammonia injection shall be incorporated within the boilers. Ammonia shall be injected continuously during all periods of operation at a rate which results in compliance with the NO<sub>x</sub> emission limits. It is ultimately, DECI's burden to maintain SO<sub>2</sub> and NO<sub>x</sub> emissions below the limits given in this permit during all periods of operations independent of biomass fuel type and fuel availability. Biomass fuel type, availability, and/or composition can not be utilized as a rationale for excess emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
71. **PERFORMANCE TESTS:** At times as specified by EPA, DECI shall conduct performance tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> and furnish the Kern County Air Pollution Control District and EPA a written report of the results of such tests. The tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted on an annual basis and at the maximum operating capacity of the facility being tested. Upon written request (Attn: A-3-3) from DECI, EPA may approve the conducting of performance tests at a lower specified production rate. Also, upon written request from DECI, EPA may approve the deletion of a specific annual test for the combustion unit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
72. **PERFORMANCE TEST METHODS:** Performance tests for the emissions of SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted and the results reported in accordance with the test methods set forth in 40 CFR 60, Part 60.8 and Appendix A and 40 CFR Part 51 Appendix M. The following test methods shall be used: a) Performance tests for the emission of SO<sub>2</sub> shall be conducted using EPA Methods 1-4, and b) Performance tests for the emissions of NO<sub>x</sub> shall be conducted using EPA Methods 1-4, and c) Performance tests for the emissions of PM<sub>10</sub> shall be conducted using EPA Method 201(a), and d) Performance tests for the emissions of CO shall be conducted using EPA Methods 1-4 and 10. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
73. **PERFORMANCE TEST NOTICE:** EPA (Attn: A-3-3) shall be notified in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. such prior approval will minimize the possibility of EPA rejection of test results for procedural deficiencies. In lieu of the above mentioned test methods, equivalent methods may be used with prior written approval from EPA. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
74. **PERFORMANCE TEST ACCOMMODATIONS:** For performance test purposes, sampling ports, platforms, and access shall be provided by DECI on the combustion exhaust system in accordance with 40 CFR 60.8(e). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
75. **SO<sub>2</sub> EMISSION LIMIT:** Boiler shall not discharge or cause the discharge into the atmosphere SO<sub>2</sub> in excess of the more stringent of 13.2 lb/hr or 18.8 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 316.8 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
76. **NO<sub>x</sub> EMISSION LIMIT:** Boiler shall not discharge or cause the discharge into the atmosphere NO<sub>x</sub> (asNO<sub>2</sub>) in excess of the more stringent of 32 lb/hr or 63 ppmvd @ 3% O<sub>2</sub> (24-hour rolling average) or 767.5 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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77. **PM10 EMISSION LIMIT:** Boiler shall not discharge or cause the discharge into the atmosphere filterable PM10 in excess of the more stringent of 8.9 lb/hr or 0.01 gr/dscf @ 12% CO<sub>2</sub> (3-hour rolling average) or 213 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
78. **CO EMISSION LIMIT:** Boiler shall not discharge or cause the discharge into the atmosphere CO in excess of the more stringent of 56 lb/hr or 183 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 1344 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
79. **OPACITY:** Boiler shall not discharge or cause the discharge into the atmosphere any gases with an opacity in excess of 20% except for aggregate periods of less than 3 minutes in any one hour period from each of the stacks venting each of the fluidized bed combustion units. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
80. **BOILER HEAT INPUT:** DECI shall continuously record the steam output and the steam temperature and pressure from the boiler; also, DECI shall determine the boiler efficiency annually. The heat input, as determined from the boiler efficiency and steam production rate, shall not exceed 400 MMBtu/hr. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
81. **OFFSET RESTRICTION:** If the emission limit for any of the above pollutants (SO<sub>2</sub>, NO<sub>x</sub>, PM10, and CO) is revised, the difference between the pollutant emission limit set forth above and the lower pollutant emission limit shall not be allowed as an emission offset for future construction or modification. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
82. **CONTINUOUS MONITORING:** DECI shall maintain and operate a continuous monitoring system to measure stack gas NO<sub>x</sub>, CO, SO<sub>x</sub>, O<sub>2</sub> and Opacity in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR 60.13 and 40 CFR 60, Appendix B, Performance Specifications 1,2,3,and 4). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
83. **CONTINUOUS MONITORING:** DECI shall maintain and operate a continuous monitoring system to measure stack gas volumetric flow rates in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR Part 60, Appendix B, Performance Specification 6). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
84. **CONTINUOUS MONITORING REPORT:** DECI shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. b) Specific identification of each period of excess emissions that occurs during start-ups, shutdowns, and malfunctions of any of the boilers. The nature and cause of any malfunction (if known) and the corrective action take or preventative measures adopted shall also be reported. c) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments. d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
85. **CONTINUOUS MONITORING:** Excess emissions shall be defined as any three-hour period during which the average emissions of PM10, SO<sub>2</sub>, and/or CO, as measured by the continuous monitoring system or by a performance test, exceeds the maximum emission limits. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
86. **CONTINUOUS MONITORING:** Excess emissions shall be defined as any 24-hour period during which the average emissions of NO<sub>x</sub>, as measured by the continuous monitoring system or by a performance test, exceeds the NO<sub>x</sub> maximum emission limit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
87. **CONTINUOUS MONITORING:** Excess emissions shall be defined as any three-minute period during which the average opacity as measured by the continuous monitoring system exceed the maximum emission limit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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88. **CONTINUOUS MONITORING:** Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limits for the purposes of this permit except for SO<sub>2</sub> and CO 3-hour emission limits and the opacity minute limit during normal startup or shutdown: (1) Startup shall be considered that period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. (2) Shutdown shall be considered that period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 and 75%. (3) Daily emission limits apply at all times except during refractory cure. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
89. **CONTINUOUS MONITORING:** DECI shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
90. **FUEL USE:** Only PUC quality natural gas, biomass, sand, limestone, ammonia, air and onsite generated, dewatered cooling tower sludge shall be fired in boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
91. **FUEL USE:** Biomass fuel sulfur shall not exceed 0.90% dry weight and biomass fuel nitrogen shall not exceed 2.5% dry weight. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
92. **FUEL USE:** Biomass means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removals, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips and wood waste, including clean, chipped wood products, plywood, particle board, fiberboard and wood products manufacturing wastes, wood based construction demolition materials, pallets, crates and boxes. Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal solid waste. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
93. **FUEL USE:** Additional biomass fuels may be administratively appended to this list upon a written request by the permittee to add an unlisted fuel, and provided the permittee can demonstrate that emissions of affected pollutants will not increase and that the boiler is designed to accommodate such fuel without physical or operational modifications. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
94. **FUEL USE:** Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal waste. In addition, contamination of the biomass fuel shall not exceed 0.04% by weight plastics and 0.62% by weight of metals, plastics, paper, painted wood, preservative treated wood and nonwood roofing materials (except asbestos). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
95. **FUEL USE:** The permittee shall continuously record the steam output from the boiler and shall annually determine boiler efficiency from the results of boiler efficiency tests. From these parameters the heat input to the boiler (on a 365 day rolling average) shall be determined and recorded. The heat input as determined from the boiler efficiency and steam production rate shall not exceed 315 MMBtu/hr. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
96. **FUEL USE:** The boiler shall not consume more than 14,285.7 scf/hr of natural gas with a higher heating value (HHV) of 1,050 Btu/scf. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
97. **NEW SOURCE PERFORMANCE STANDARDS:** The boiler shall meet all applicable requirements of 40 CFR 60 Subparts A and Db. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
98. **AGENCY NOTIFICATIONS:** All correspondence as required by this Operating Permit shall be forwarded to the following addresses: 1) Director, Air and Toxics Division (Attn: A-3-3), EPA Region 9, 75 Hawthorne St, San Francisco, CA 94105; 2) Chief, Stationary Source Division, California Air Resources Board, PO Box 2815, Sacramento, CA 95812; 3) Assistant Air Pollution Control Officer, SJVUAPCD, 2700 "M" Street, Suite 275, Bakersfield, CA 93301. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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99. The owner/operator shall maintain an operating log that includes the type and quantity of fuel used and the hhv of each fuel as determined by District Rule 4352, section 6.4 (as amended 10/19/95), or as certified by a third party fuel supplier. [District Rule 4352] Federally Enforceable Through Title V Permit
100. Particulate Matter emissions shall not exceed 10.0 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
101. Records of startup and shutdown times and startup and shutdown emissions shall be maintained [District Rule 2201] Federally Enforceable Through Title V Permit
102. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] 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:** S-75-7-3

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

44,883 GALLON ASH STORAGE SILO WITH UNLOADING SPOUT, BOTH SERVED BY BIN VENT FILTER WITH 95 SQ.FT FILTER AREA AND 1/2 HP MOTOR - SILO RECEIVING MATERIAL FROM PHASE I AND PHASE II ASH HANDLING CONVEYOR

## PERMIT UNIT REQUIREMENTS

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1. Phase I ash handling system shall include three boiler ash conveyors, eight baghouse rotary feeders, two baghouse conveyors, one main ash conveyor and one silo conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Phase II ash handling system shall include one boiler ash conveyors, six baghouse rotary feeders, two baghouse conveyors, one main ash conveyor and one silo conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Silo shall include vibrating bin, rotary feeder, bin vent filter and paddle type ash conditioner. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Ash shall not be removed from any ash hopper, conveying system or ash silo by manual means during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Operation shall include telescoping ash unloading spout and 5 hp dust withdrawal fan discharging collected particulate back into ash silo served by bin vent. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Only material which has been mixed with sufficient water to prevent visible emissions, of 5% opacity or greater, shall be unloaded from ash silo unloading conditioner. [District NSR Rule] Federally Enforceable Through Title V Permit
8. There shall be no visible emissions of 5% opacity or greater from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Only covered truck shall be loaded with ash silo contents. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Storage silo shall vent only through bin vent filter. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Bin vent filter shall have a maximum air to cloth ratio of 5 ft./min, and minimum filter area of 95 sq. ft. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Bin vent filter shall be equipped with adjustable, automatic reverse pulse jet cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Bin vent filter shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Bin vent filter exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods. [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.

15. Ash silo unloading conditioning unit shall be dust tight. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Records of amounts of ash loaded into disposal trucks shall be maintained and made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The maximum emission rate of volatile organic compounds shall not exceed 0.02 lbm/day. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed 0.010 grains/dscf in concentration. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] 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:** S-75-9-5

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

FUEL RECEIVING, SCREENING & CONVEYING OPERATION INCLUDING 60 TON CAPACITY TRUCK TIPPER PLATFORM, FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 100 TON/HR FUEL RECEIVING CONVEYOR #11 W/BELT SCALE WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-11 TO DS-3, HOG-2 TO BC-13, BC-12; STATION #3 SERVES POINTS BC-16 & BC-17), AND HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADER #3

## **PERMIT UNIT REQUIREMENTS**

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1. Truck tipper platform, fuel receiving hopper, and fuel receiving conveyor shall vent only to fabric collector #5. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fuel receiving operation shall include belt type magnetic separator #3. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Fuel receiving operation shall be equipped with ventilation system and fabric collector #5 with a minimum filter area of 4,875 sq. ft., maximum air-to-cloth ratio of 8:1, 100 hp exhaust fan, 5.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Fuel receiving operation shall be equipped with disk type scalping screen and two position pneumatically operated diverter gate #5. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fuel receiving operation shall be equipped with swing hammer type hog with metal trap. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fuel receiving operation shall be equipped with 50 ton/hr capacity disk screen overs conveyor #12 with operational foam dust suppression, 100 ton/hr capacity screen/hog discharge conveyor #13 with operational foam dust suppression, and 135 ton/hr capacity fuel transfer conveyor #14. [District NSR Rule]
7. Fuel receiving operation shall be equipped with ventilation systems and fabric collector #6 with a minimum filter area of 2,505 sq. ft., maximum air-to-cloth ratio of 8:1, 60 hp exhaust fan, 3.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Fabric collector #6 shall serve disk type scalping screen, diverter gate #5, swing hammer type hog, disk screen overs conveyor #12, screen/hog discharge conveyor #13, and fuel transfer conveyor #14. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fuel receiving operation shall be equipped with two position pneumatically operated diverter gates number 6 and number 7. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Fuel receiving operation shall be equipped with 135 ton/hr capacity fixed stacker feed conveyor #17 with operational foam dust suppression. [District NSR Rule]
11. Fuel receiving operation fixed stacker shall be equipped with telescoping spout with dust pick-up shroud. [District NSR Rule]
12. Fuel receiving operation shall be equipped with 170 ton/hr capacity radial stacker feed conveyor #15. [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.

13. Fuel receiving operation shall be equipped with 170 ton/hr capacity radial stacker conveyor #16 with operational foam dust suppression shared with permit unit S-75-10. [District NSR Rule]
14. Fuel receiving operation radial stacker shall be equipped with telescoping spout with dust pick-up shroud. [District NSR Rule]
15. Foam injection nozzles on radial and fixed stacker conveyors BC16 and BC17 shall be operated as needed, to ensure dust emissions have visible emissions of less than or equal to 20% opacity. [District NSR Rule]
16. Fuel receiving operation shall be equipped with ventilation system and fabric collector #7 with minimum of 4,466 sq. ft. filter area, maximum air-to-cloth ratio of 8:1, 200 hp exhaust fan, 5.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Fabric collector #7 shall serve diverter gates #6 and #7, fixed stacker feed conveyor #17, fixed stacker telescoping spout, radial stacker feed conveyor #15, radial stacker conveyor #16, radial stacker telescoping spout, and equipment identified on permit S-75-10. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Truck tipper receiving hopper ventilation pickup points shall prevent particulate matter emissions to atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Truck tipper receiving hopper ventilation hood and hog ventilation hoods shall provide minimum indraft velocity of 200 ft./min. during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Truck tipper receiving hopper drag chain conveyor transfer point hood shall provide minimum indraft velocity of 150 ft./min. during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Conveyor belt ventilation hood(s) shall provide minimum indraft velocity of 500 cfm/ft. of belt width during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Scalping screen ventilation hood shall be designed to provide minimum indraft velocity of 50 ft./min. during entire truck unloading/screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Each fabric collector shall be equipped with adjustable automatic reverse pulse filter cleaning mechanism and operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
25. Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Radial stackers telescoping spout discharge height shall be maintained as close as possible to top of storage pile. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Each ventilation system duct shall be equipped with capped 3/4 in. pitot port in an accessible location to facilitate duct velocity determination measurement. [District Rule 1081] Federally Enforceable Through Title V Permit
28. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,400 ft./min. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Deliveries of wood waste fuel shall not exceed 46 truck loads per day without prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Ventilation system and fabric collector shall operate whenever material is being transferred into or out of receiving hoppers. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Wood waste delivery trucks shall remain covered during entire unloading operation. [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.

32. There shall be no visible emissions of 5% opacity or greater from truck tipper or receiving hopper during entire unloading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
33. Truck tipper receiving hopper fabric collector #5 shall be operated whenever material is being transferred into and out of hoppers. [District NSR Rule] Federally Enforceable Through Title V Permit
34. There shall be no visible emissions of 5% opacity or greater from conveyor transfer points, scalping screen, and hog enclosures, including inlet and outlet openings. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Ventilation system and fabric collector #6 shall be operated whenever material is being transferred from fuel receiving operation. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Ventilation system and fabric collector #7 shall be operated whenever material is being transferred from fuel receiving operations. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Fuel transfer conveyors shall be covered and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Any stored fuel which is burning shall be immediately segregated and extinguished. [District NSR Rule] Federally Enforceable Through Title V Permit
39. All access roads and roadways associated with truck unloading operations shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Operator shall visually check each truckload for unacceptable fuel before unloading. For non-agricultural fuel (e.g. secondary wood), a representative sample shall be taken from each source each day and stored for one month. [District NSR Rule] Federally Enforceable Through Title V Permit
41. Fuel samples shall be made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Particulate matter (PM-10) emissions from all fabric collectors shall not exceed 0.004 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Particulate matter (PM-10) emissions from truck dump area fabric collector #5 shall not exceed 1.18 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Particulate matter (PM-10) emissions from scalping screen/hog area fabric collector #6 shall not exceed 0.67 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
45. Particulate matter (PM-10) emissions from stacker/reclaimer fabric collector #7 shall not exceed 1.25 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
46. Fugitive particulate matter (PM-10) emissions from fuel storage piles shall not exceed 60.81 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
47. Particulate matter (PM-10) emissions at fabric collector exhaust stacks shall be determined by District-witnessed sample collection by independent testing firm within 60 days after startup of this equipment. [District Rule 1081] Federally Enforceable Through Title V Permit
48. Official test results and field data collected shall be submitted to the District within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
49. Particulate matter collected by fabric collectors shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
50. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
51. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

52. Dust collector filters shall be thoroughly inspected at least quarterly when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
53. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
54. Operator shall record the daily number of truck deliveries of wood waste fuel. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
55. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
56. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 & Kern County Rule 404] 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:** S-75-10-8

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

FUEL RECLAMATION, CONVEYING & SCREENING OPERATION INCLUDING 35 TON/HR TRAVELING VARIABLE HEIGHT FUEL RECLAIMER #DC-4 WITH WATER SPRAY SYSTEM AND BOOMING AND SLEWING SYSTEM (SHARED WITH S-75-9) (PHASE II) WITH FOAM DUST SUPPRESSION SYSTEM (STATION # 1 SERVES TRANSFER POINTS DS-4 TO ABORT CHUTE AND DS-4 TO BC-21; STATION # 3 SERVES TRANSFER POINTS BC-18 TO BC-20 AND BC-19 TO BC-20), FABRIC FILTER DUST COLLECTORS # 9 AND # 11, AND MAC H85 CYCLONE # 2

## **PERMIT UNIT REQUIREMENTS**

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1. Fuel reclamation operation shall be equipped with reclaimer table and reclaim transfer conveyor #19 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fuel reclamation operation shall be equipped with self-cleaning belt-type magnetic separator #4, and magnetic discharge take away conveyor #24. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Fuel reclamation operation shall be equipped with partially enclosed 35 ton/hr auxiliary reclaim hopper #DC-5 with water sprays, and inclined live chain bottom and double spike roll discharger. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Fuel reclamation operation shall be equipped with 35 ton/hr capacity auxiliary reclaimer discharge conveyor #18. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #7. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fuel reclamation operation shall be equipped with 35 ton/hr capacity, secondary screen feed conveyor #20 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Fuel reclamation operation shall be equipped with self cleaning, belt type, magnetic separator #5 and collection system. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #8. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fuel reclamation operation shall be equipped with secondary disk type, scalping screen and oversized discharge chute and bunker. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Fuel reclamation operation shall be equipped with 35 ton/hr capacity boiler feed conveyor #21 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fuel reclamation operation shall be equipped with ventilation system, cyclone #2 (MAC H85) and fabric collector #9 with minimum of 1,832 sq. ft. filter area, maximum air-to-cloth ratio of 10.92 ft/min, 60 hp exhaust fan, reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Material collected by MAC H85 cyclone #2 shall discharge either to conveyor BC-21 or to the covered truck loadout listed on permit S-75-5. [District Rule 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.

13. Secondary scalping screen fabric collector #9 shall serve secondary screen conveyor #20, magnetic separator #5, diverter gate #8, secondary scalping screen, discharge chute and bunker, boiler feed conveyor, and beginning of fuel reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Fuel reclamation operation shall be equipped with boiler distribution conveyor #DC-6. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Fuel reclamation operation shall be equipped with 35 ton/hr capacity, overfeed conveyor #22. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #9. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Fuel reclamation operation shall be equipped with abort bunker. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Fuel reclamation operation shall be equipped with ventilation system and fabric collector #11 with minimum of 1430 sq. ft. filter area, maximum air-to-cloth ratio of 8.2 ft/min, 50 hp exhaust fan, reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Boiler area fabric collector #11 shall serve boiler distribution conveyor #DC-6, overfeed conveyor #22, diverter gate #9, abort bunker, and existing #BC-9. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Conveyor belt ventilation hood(s) shall provide minimum indraft velocity of 500 cfm/ft. of belt width during fuel reclamation, conveying and screening operation. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Secondary scalping screen ventilation hood shall provide minimum indraft velocity of 50 ft./min. while screen is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Each fabric collector shall be equipped with adjustable automatic reverse pulse filter cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Each fabric collector shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
25. Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Each ventilation system duct shall be equipped with capped 3/4 in. pitot port in an accessible location to facilitate duct velocity determination measurement. [District NSR Rule] Federally Enforceable Through Title V Permit
27. All ventilation system ducts shall be sized for minimum duct transport velocity of 3,400 ft./min. [District NSR Rule] Federally Enforceable Through Title V Permit
28. There shall be no visible emissions of 5% opacity or greater from storage pile during reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
29. There shall be no visible emissions of 5% opacity or greater from conveyor transfer points, scalping screen, and fuel storage bin, including inlet and outlet openings. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Boiler area fabric collector #11 shall be operated whenever material is being transferred from fuel reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Fuel transfer conveyors shall be covered and covers shall be in place whenever conveyors are operating. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Particulate matter (PM10) emissions from fabric collector #9 shall not exceed 0.004 gr/scf, and maximum air flow shall not exceed 20,000 cfm. [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.



33. Particulate matter (PM10) emissions from fabric collector #11 shall not exceed 0.0036 gr/scf, and maximum air flow shall not exceed 11,750 cfm. [District NSR Rule] Federally Enforceable Through Title V Permit
34. All access roads and roadways associated with fuel reclamation operation shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Particulate matter collected by fabric collectors shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. Dust collector filters shall be thoroughly inspected at least quarterly when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
40. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
41. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 & Kern County Rule 404] 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:** S-75-11-24

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

315 MMBTU/HR EPI FLUIDIZED BUBBLING BED, BIOMASS-FUELED BOILER (UNIT #2) WITH NH<sub>3</sub>, LIMESTONE, SAND AND SODIUM BICARBONATE (NAHCO<sub>3</sub>) INJECTION, WITH BOILER EXHAUST VENTED TO SIX COMPARTMENT FABRIC FILTER DUST COLLECTOR; AND FOUR 10 MMBTU/HR THERMAL SOLUTIONS INCORPORATED MODEL NO. TSI-10 PORTABLE NATURAL GAS-FIRED REFRACTORY CURING HEATERS

## **PERMIT UNIT REQUIREMENTS**

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1. 15 MMBtu/hr start-up and 40 MMBtu/hr overhead natural gas-fired burners shall be of "low-NOx" design utilizing staged combustion principles. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Boiler shall be equipped with two steam turbines powering a 24.5 MW (gross) electrical generator. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Boiler shall be equipped with a sodium bicarbonate (NaHCO<sub>3</sub>) injection system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Boiler shall be equipped with sand supply/reinjection system including two bucket elevators. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Boiler exhaust shall be served by fabric collector. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fabric collector shall be equipped with operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Combustion air supply lines and auxiliary burner natural gas supply line shall be equipped with operational volumetric flow-rate indicators. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Selective non-catalytic reduction ammonia injection system shall be equipped with operational ammonia volume flow-rate indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fabric collector exhaust stack shall be equipped with permanent stack sampling provisions (ports, platform, ladder, etc.) consistent with E.P.A. test methods and District Rule 1081 requirements. [District Rule 1081] Federally Enforceable Through Title V Permit
10. Fabric collector exhaust stack shall be equipped with recording continuous monitors for opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO, O<sub>2</sub>, and flue gas volume flow-rate per Rule 1081. [District Rule 1081 and District NSR Rule] Federally Enforceable Through Title V Permit
11. Continuous monitoring systems for opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO, and O<sub>2</sub>, shall meet E.P.A. monitoring performance specifications appearing in 40 CFR 60.13 and 40 CFR Appendix B, Performance Specifications 1. 2. 4. & 4A. [40 CFR 60 Subpart Db] Federally Enforceable Through Title V Permit
12. Continuous monitoring system for flue gas volume flow-rate shall meet E.P.A. monitoring performance specifications appearing in 40 CFR Part 52 appendix E. [40 CFR 60 Subpart Db] Federally Enforceable Through Title V Permit
13. Permittee shall comply in full with the requirements of Rule 4001 New Source Performance Standards part 60 subpart A. and subpart Db. [40 CFR 60 Subpart A and Db] 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. Only PUC quality natural gas, biomass, sand, limestone, ammonia, air, sodium bicarbonate ( $\text{NaHCO}_3$ ), and on-site generated dewatered cooling tower sludge shall be introduced into boiler. [District NSR Rule and Rule 4102] Federally Enforceable Through Title V Permit
15. "Biomass" means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removals, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn, yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips, and wood waste. Biomass does not include material containing sewage sludge or industrial, hazardous, radioactive or municipal solid waste. [District NSR Rule and Rule 4102] Federally Enforceable Through Title V Permit
16. Wood waste includes clean, chipped wood products, plywood, wood products manufacturing wood materials, construction and demolition wood materials, and wood pallets, crates and boxes. [District NSR Rule and Rule 4102] Federally Enforceable Through Title V Permit
17. Contamination of the biomass fuel, as delivered to the boiler, shall not exceed 0.04% by weight plastics or 0.62% by weight total of the following materials: metals, plastics, paper, painted wood, particle board, wood treated with preservatives, and non-wood roofing materials (except asbestos). [District Rule 4102]
18. Biomass fuel sulfur content shall not exceed 0.90% by weight on a dry basis. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Biomass fuel nitrogen content shall not exceed 2.50% by weight on a dry basis. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Startup burner shall not operate when feed rate of biomass exceeds 20 tons per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Removal of ash from ash hoppers by manual means shall only be conducted during breakdown conditions or when boiler is not operating, and there shall be no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than ringelmann 1 or 20% opacity. [District Rules 4101 and 4102] Federally Enforceable Through Title V Permit
22. Limestone, sodium bicarbonate ( $\text{NaHCO}_3$ ) and/or onsite generated cooling tower sludge, shall be injected into boiler at a rate in pounds per ton of biomass fuel introduced into boiler which results in compliance with the  $\text{SO}_x$  emission limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Ammonia shall be injected into boiler at a rate, in pounds per ton of biomass fuel introduced into boiler, which results in compliance with the  $\text{NO}_x$  emission limitation. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Ammonia injection rate shall be controlled to prevent the emission of free ammonia in excess of 20 ppmv or such level as required to prevent detectable odors or a maximum concentration of 50 ppmv at ground level. [District NSR Rule and Rule 4102] Federally Enforceable Through Title V Permit
25.  $\text{NO}_x$  and  $\text{PM}_{10}$  emission data shall be obtained and provided, as required by NSPS 40CFR60.48b "Emissions monitoring for particulate and nitrogen oxides". CEM data shall be provided as required by 60.48b(f). [40 CFR 60 Subpart Db] Federally Enforceable Through Title V Permit
26. Particulate matter ( $\text{PM}_{10}$ ) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.045 lb/MMBTU of filterable particulates and 14.08 lb/hr of filterable and condensable particulates. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Sulfur compound emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 23 ppmvd @ 3%  $\text{O}_2$  and 12.09 lb/hr (as  $\text{SO}_2$ ). [District NSR Rule] Federally Enforceable Through Title V Permit
28. Oxides of nitrogen emissions (as  $\text{NO}_2$ ), except for periods of startup and shutdown as defined in this permit, shall not exceed 0.10 lb/MMBTU and 31.50 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Volatile organic compound (VOC) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.020 lb/MMBTU and 6.3 lb/hr. [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.

30. Carbon monoxide (CO) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 183 ppmvd @ 3% CO<sub>2</sub> and 44.10 lb/hr. On days in which a startup and shutdown of this unit occurs, CO emissions shall not exceed 500 lb/hr in any single hour during the startup or shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Emission rates shall not exceed any of the following: PM<sub>10</sub>: 337.9 lb/day, SO<sub>x</sub> (as SO<sub>2</sub>): 290.2 lb/day, NO<sub>x</sub> (as NO<sub>2</sub>): 756.0 lb/day, VOC: 151.2 lb/day or CO (except during days of refractory cure or on days with startup and shut operations): 1058.4 lb/day. On days in which a startup and shutdown of this unit occurs, CO emissions shall not exceed 3,500 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
32. On days of refractory cure using startup burner, CO emissions shall not exceed 6,240 lb/day and heat input to boiler shall not exceed 3,206.6 MMBtu/day. CO emission limit on each refractory cure day shall be determined by records of fuel use, fuel heat content, and resulting maximum daily heat rate. [District NSR Rule] Federally Enforceable Through Title V Permit
33. On days of refractory cure using four 10 MMBtu/hr refractory cure heaters, heat input shall not exceed 960 MMBtu/day to the refractory cure heaters. Refractory burner emission rates shall not exceed any of the following: PM<sub>10</sub>: 0.0076 lb/MMBtu, SO<sub>x</sub> (as SO<sub>2</sub>): 0.00285 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 0.1 lb/MMBtu, VOC: 0.0055 lb/MMBtu or CO: 0.3 lb/MMBtu. Daily records of fuel use, fuel heat content, and resulting daily heat rate input shall be kept, to demonstrate compliance with emission limits during refractory curing. [District NSR Rule] Federally Enforceable Through Title V Permit
34. This boiler shall not be operated under refractory cure conditions for more than 6 days per year. Refractory cure shall not be performed on more than one unit (Boiler #1, S-75-6 or Boiler #2, S-75-11) at any time. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Permittee shall notify the District in writing of the start date and end date of operating under refractory cure and alternate CO emission limit condition. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Excess emissions of PM<sub>10</sub> shall be defined as any three hour period during which the average emissions of PM<sub>10</sub> exceeds any emission limit. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Excess emissions of NO<sub>x</sub>, SO<sub>x</sub>, and CO as shown by the continuous monitoring system shall be defined as any 24 hour period during which the average emissions of NO<sub>x</sub>, SO<sub>x</sub>, or CO exceed any emissions limit, except as noted in this permit on days of refractory cure or on day(s) in which a startup or shutdown of this unit occurs. [District NSR Rule] Federally Enforceable Through Title V Permit
38. "Startup" is the period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. [District NSR Rule] Federally Enforceable Through Title V Permit
39. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. [District NSR Rule] Federally Enforceable Through Title V Permit
40. "Shutdown" is the period of time during which the boiler is allowed to cool from it's operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 & 75%. [District NSR Rule] Federally Enforceable Through Title V Permit
41. "Steady state" load is defined as the operational conditions that generate electrical power at + or - one (1) megawatt from the target load established and documented by control room log book. [District NSR Rule] Federally Enforceable Through Title V Permit
42. During periods of startup/shutdown emissions shall be minimized to the extent possible using good combustion practices. [District Rule 2201] Federally Enforceable Through Title V Permit
43. Annual audits of continuous monitors shall be conducted by independent laboratory in accordance with E.P.A. guidelines, shall be witnessed by District and results shall be submitted to District within 60 days of such audit pursuant to Rule 1080. [District Rule 1080] Federally Enforceable Through Title V Permit
44. Upon District request, a District approved 25 ton representative sample of biomass fuel in the reclaim pile shall be sorted. [District Rule 4102]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

45. Data collected during sorting of 25 ton sample of biomass fuel shall be in pounds of material per ton of biomass, by category as identified in fuel contamination limit condition, and official test results and field data shall be submitted within 30 days after collection. [District Rule 4102]
46. District-witnessed emission sample collection for PM10, SOx, NOx and CO (except CO during designated refractory cure days) shall be conducted by an independent testing laboratory annually 60 days prior to permit anniversary date of August 31, or within 60 days of start-up if the unit did not operate between July 3 and August 31. [District Rule 1081] Federally Enforceable Through Title V Permit
47. Source testing for the following parameters shall be conducted using the stated test methods: NOx - EPA Method 7 or ARB Method 100, CO - EPA Method 10 or ARB Method 100, CO2 - EPA Method 3 or ARB Method 100, O2 - EPA Method 3 or ARB Method 100, SO2 - EPA Method 6 or ARB Method 100, PM10 - EPA Methods 201A & 202 or Method 5, Stack Gas Flow Rate - EPA Method 2, Moisture Content - EPA Method 4, Ammonia - BAAQMD ST1B, & Fuel Heating Value - ASTM Method D2015-85 or E711. [District NSR Rule] Federally Enforceable Through Title V Permit
48. Official test results and field data from compliance testing shall be submitted within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
49. NOx emissions shall not exceed 275,920 lb in any 12 month period. [District NSR Rule] Federally Enforceable Through Title V Permit
50. Permittee shall project and use the proper mix of fuels to ensure that actual emissions from boiler S-75-11 are offset with creditable biomass on a quarterly basis. Quarterly NOx emission offsets required from creditable biomass = (Actual quarterly emissions) - (604.8 lb/day x days/qtr). [District NSR Rule] Federally Enforceable Through Title V Permit
51. Open-burning emission factors used to determine the quantity of offsets available from the diversion of biomass from open-burning are listed in the attachment "Open Burn Emission Factors" (District policy SSP-2005). [District NSR Rule] Federally Enforceable Through Title V Permit
52. If quarterly actual NOx emissions from boiler S-75-11 are greater than zero, the emission reduction credit from creditable biomass fuel shall be calculated for NOx using the following formula:  $Pq = x * [\text{sum of } j=1 \text{ to } n \text{ for } (Bj) * (EFj) * (HBFj) * (QDFjq)]$  where:  $Pq$  = Pollutant offset credit in lb/qtr = sum of NOx emissions from ag waste credit < 15 miles + NOx emissions > 15 miles from facility.  $q$  = calendar quarter,  $x = 0.5$  for biomass originating > 15 miles and 0.833 for < 15 miles.  $j$  = each creditable biomass type.  $B$  = tons of biomass type ( $j$ ) used per quarter.  $EF$  = emission factor for particular biomass (from SSP-2005).  $HBFj$  = fraction of biomass type ( $j$ ) that has been demonstrated to have historically open field burned (for orchard prunings  $HBF=0.96$ , for other biomass a District approved HBF factor must be used).  $QDFjq$  = Quarterly distribution factor - fraction of burning of biomass ( $j$ ) which occurs in calendar quarter ( $q$ ). For orchard prunings  $QDF = Q1: 0.251, Q2: 0.275, Q3: 0.149, Q4: 0.325$ . [District NSR Rule] Federally Enforceable Through Title V Permit
53. Permittee shall maintain accurate records of continuous emissions monitoring (CEM) results, dates of occurrences and duration of start-up, shutdown, malfunction, performance testing, evaluations, calibrations, checks, adjustments and maintenance, and daily records of natural gas fuel usage. [District Rule 1080 and District NSR Rule] Federally Enforceable Through Title V Permit
54. Daily records for each load of creditable biomass received shall be maintained which include the geographic origin (for applicability of distance offset ratio), date, weigh ticket number, supplier name, fuel type, tons received, the offset ratio for the load of biomass, and the amount of offset credit (in pounds of NOx) attributable to each load of biomass. Records shall include certifications that any creditable biomass for which offset credit is claimed has historically been open burned in the San Joaquin Valley air basin. [District NSR Rule] Federally Enforceable Through Title V Permit
55. Permittee shall submit to the District a quarterly report accounting for the tonnage of agricultural waste eliminated from open field burning and used as plant fuel. [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.

56. Quarterly report of agricultural waste eliminated from open field burning (to offset NOx emissions) used as fuel at facility shall document creditable ag waste fuel receipt quantities, if fuel originates > 15 miles from facility, offset credit ratios, emission factors used, and summary of the resultant emissions offsets provided using "the procedure", and shall be submitted to the District within 30 days of the end of the quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
57. Quarterly report, of agricultural waste eliminated from open field burning used for the purpose of providing required NOx offsets, shall document historical biomass fraction (HBF) and quarterly distribution factor (QDF) for each biomass fuel used to calculate credit. For orchard prunings HBF = 0.96 and QDF = as stated in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
58. This PTO involved a NOx BACT re-determination, which was based on the argument that relaxing the NOx BACT limit would eliminate optically dense visible emissions. Should optically dense visible emissions continue or recur, this BACT re-determination shall be nullified, and the NOx BACT emission limit shall revert to 0.08 lb/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
59. FACILITIES OPERATION: All equipment, facilities, and systems shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
60. MALFUNCTION: The Director of the Air and Toxics Division shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit. In addition, the Director of the Air and Toxics Division shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of the permit or of any law or regulations which such malfunction may cause. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
61. RIGHT TO ENTRY: The Regional Administrator, the head of the State Air Pollution Control Agency, the head of the responsible local air pollution control agency, and/or their authorized representatives, upon the presentation of credentials, shall be permitted: A) to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit; B) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; C) to inspect any equipment, operation, or method required in this permit; D) to sample emissions from the source. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
62. TRANSFER OF OWNERSHIP: In the event of any changes in control or ownership, this permit shall be binding on all subsequent owners and operators. The applicant shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the Regional Administrator and the State and local Air Pollution Control Agency. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
63. SEVERABILITY: The provisions of this permit are severable, and, if any provisions of this permit is held invalid, the remainder of this permit shall not be affected thereby. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
64. OTHER APPLICABLE REGULATIONS: The owner and operator shall operate the stationary source in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, state and local air quality regulations. [PSD ATC SJ 90-01] 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.

65. AIR POLLUTION CONTROL EQUIPMENT: Limestone shall be injected directly into the combustion chambers of the boiler as required to attain the emission limit for SO<sub>2</sub>. Based on previous operating experience, DECI shall, to the best of its ability, anticipate periods when a high sulfur biomass fuel and/or inherently low calcium bearing biomass fuel is utilized such that the addition of limestone is required to attain the emission limits. A SNCR system utilizing ammonia injection shall be incorporated within the boilers. Ammonia shall be injected continuously during all periods of operation at a rate which results in compliance with the NO<sub>x</sub> emission limits. It is ultimately, DECI's burden to maintain SO<sub>2</sub> and NO<sub>x</sub> emissions below the limits given in this permit during all periods of operations independent of biomass fuel type and fuel availability. Biomass fuel type, availability, and/or composition can not be utilized as a rationale for excess emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
66. PERFORMANCE TESTS: At times as specified by EPA, DECI shall conduct performance tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> and furnish the Kern County Air Pollution Control District and EPA a written report of the results of such tests. The tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted on an annual basis and at the maximum operating capacity of the facility being tested. Upon written request (Attn: A-3-3) from DECI, EPA may approve the conducting of performance tests at a lower specified production rate. Also, upon written request from DECI, EPA may approve the deletion of a specific annual test for the combustion unit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
67. PERFORMANCE TEST METHODS: Performance tests for the emissions of SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted and the results reported in accordance with the test methods set forth in 40 CFR 60, Part 60.8 and Appendix A and 40 CFR Part 51 Appendix M. The following test methods shall be used: a) Performance tests for the emission of SO<sub>2</sub> shall be conducted using EPA Methods 1-4, and b) Performance tests for the emissions of NO<sub>x</sub> shall be conducted using EPA Methods 1-4, and c) Performance tests for the emissions of PM<sub>10</sub> shall be conducted using EPA Method 201(a), and d) Performance tests for the emissions of CO shall be conducted using EPA Methods 1-4 and 10. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
68. PERFORMANCE TEST NOTICE: EPA (Attn: A-3-3) shall be notified in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. such prior approval will minimize the possibility of EPA rejection of test results for procedural deficiencies. In lieu of the above mentioned test methods, equivalent methods may be used with prior written approval from EPA. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
69. PERFORMANCE TEST ACCOMMODATIONS: For performance test purposes, sampling ports, platforms, and access shall be provided by DECI on the combustion exhaust system in accordance with 40 CFR 60.8(e). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
70. SO<sub>2</sub> EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere SO<sub>2</sub> in excess of the more stringent of 10.4 lb/hr or 18.8 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 249.6 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
71. NO<sub>x</sub> EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere NO<sub>x</sub> (asNO<sub>2</sub>) in excess of the more stringent of 25.2 lb/hr or 63 ppmvd @ 3% O<sub>2</sub> (24-hour rolling average) or 604.8 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
72. PM<sub>10</sub> EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere filterable PM<sub>10</sub> in excess of the more stringent of 7.0 lb/hr or 0.01 gr/dscf @ 12% CO<sub>2</sub> (3-hour rolling average) or 169 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
73. CO EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere CO in excess of the more stringent of 44.1 lb/hr or 183 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 1058.4 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
74. OPACITY: Boiler shall not discharge or cause the discharge into the atmosphere any gases with an opacity in excess of 20% except for aggregate periods of less than 3 minutes in any one hour period from each of the stacks venting each of the fluidized bed combustion units. [PSD ATC SJ 90-01] 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.

75. **BOILER HEAT INPUT:** DECI shall continuously record the steam output and the steam temperature and pressure from the boiler; also, DECI shall determine the boiler efficiency annually. The heat input, as determined from the boiler efficiency and steam production rate, shall not exceed 315 MMBtu/hr. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
76. **OFFSET RESTRICTION:** If the emission limit for any of the above pollutants (SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub>, and CO) is revised, the difference between the pollutant emission limit set forth above and the lower pollutant emission limit shall not be allowed as an emission offset for future construction or modification. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
77. **CONTINUOUS MONITORING:** DECI shall maintain and operate a continuous monitoring system to measure stack gas NO<sub>x</sub>, CO, SO<sub>x</sub>, O<sub>2</sub> and Opacity in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR 60.13 and 40 CFR 60, Appendix B, Performance Specifications 1,2,3,and 4). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
78. **CONTINUOUS MONITORING:** DECI shall maintain and operate a continuous monitoring system to measure stack gas volumetric flow rates in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR Part 60, Appendix B, Performance Specification 6). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
79. **CONTINUOUS MONITORING REPORT:** DECI shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. b) Specific identification of each period of excess emissions that occurs during start-ups, shutdowns, and malfunctions of any of the boilers. The nature and cause of any malfunction (if known) and the corrective action take or preventative measures adopted shall also be reported. c) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments. d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
80. **CONTINUOUS MONITORING:** Excess emissions shall be defined as any three-hour period during which the average emissions of PM<sub>10</sub>, SO<sub>2</sub>, and/or CO, as measured by the continuous monitoring system or by a performance test, exceeds the maximum emission limits. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
81. **CONTINUOUS MONITORING:** Excess emissions shall be defined as any 24-hour period during which the average emissions of NO<sub>x</sub>, as measured by the continuous monitoring system or by a performance test, exceeds the NO<sub>x</sub> maximum emission limit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
82. **CONTINUOUS MONITORING:** Excess emissions shall be defined as any three-minute period during which the average opacity as measured by the continuous monitoring system exceed the maximum emission limit. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
83. **CONTINUOUS MONITORING:** Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limits for the purposes of this permit except for SO<sub>2</sub> and CO 3-hour emission limits and the opacity minute limit during normal startup or shutdown: (1) Startup shall be considered that period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. (2) Shutdown shall be considered that period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 and 75%. (3) Daily emission limits apply at all times except during refractory cure. [PSD ATC SJ 90-01] 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.



84. CONTINUOUS MONITORING: DECI shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
85. FUEL USE: Only PUC quality natural gas, biomass, sand, limestone, ammonia, air and onsite generated, dewatered cooling tower sludge shall be fired in boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
86. FUEL USE: Biomass fuel sulfur shall not exceed 0.90% dry weight and biomass fuel nitrogen shall not exceed 2.5% dry weight. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
87. FUEL USE: Biomass means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removals, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips and wood waste, including clean, chipped wood products, plywood, particle board, fiberboard and wood products manufacturing wastes, wood based construction demolition materials, pallets, crates and boxes. Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal solid waste. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
88. FUEL USE: Additional biomass fuels may be administratively appended to this list upon a written request by the permittee to add an unlisted fuel, and provided the permittee can demonstrate that emissions of affected pollutants will not increase and that the boiler is designed to accommodate such fuel without physical or operational modifications. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
89. FUEL USE: Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal waste. In addition, contamination of the biomass fuel shall not exceed 0.04% by weight plastics and 0.62% by weight of metals, plastics, paper, painted wood, preservative treated wood and nonwood roofing materials (except asbestos). [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
90. FUEL USE: The permittee shall continuously record the steam output from the boiler and shall annually determine boiler efficiency from the results of boiler efficiency tests. From these parameters the heat input to the boiler (on a 365 day rolling average) shall be determined and recorded. The heat input as determined from the boiler efficiency and steam production rate shall not exceed 315 MMBtu/hr. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
91. FUEL USE: The boiler shall not consume more than 142,857.1 scf/hr of natural gas with a higher heating value of 1,050 Btu/scf through the inbed and overbed burners. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
92. FUEL USE: The boiler shall not consume more than 14,285.7 scf/hr of natural gas with a higher heating value (HHV) of 1,050 Btu/scf through the startup burner. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
93. FUEL USE: The startup burner shall only be used for startup purposes. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
94. FUEL USE: The total heat input into the boiler shall not exceed 315 MMBtu/hr (HHV) when firing with both biomass and natural gas. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
95. NEW SOURCE PERFORMANCE STANDARDS: The boiler shall meet all applicable requirements of 40 CFR 60 Subparts A and Db. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit
96. AGENCY NOTIFICATIONS: All correspondence as required by this Operating Permit shall be forwarded to the following addresses: 1) Director, Air and Toxics Division (Attn: A-3-3), EPA Region 9, 75 Hawthorne St, San Francisco, CA 94105; 2) Chief, Stationary Source Division, California Air Resources Board, PO Box 2815, Sacramento, CA 95812; 3) Assistant Air Pollution Control Officer, SJVUAPCD, 2700 "M" Street, Suite 275, Bakersfield, CA 93301. [PSD ATC SJ 90-01] 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.

97. The owner/operator shall maintain an operating log that includes the type and quantity of fuel used and the hhv of each fuel as determined by District Rule 4352, section 6.4 (as amended 10/19/95), or as certified by a third party fuel supplier. [District Rule 4352] Federally Enforceable Through Title V Permit
98. Dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
99. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
100. Particulate Matter emissions shall not exceed 10.0 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
101. Records of startup and shutdown times and startup and shutdown emissions shall be maintained [District Rule 2201] Federally Enforceable Through Title V Permit
102. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] 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:** S-75-12-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

5,236 GALLON LIMESTONE RECEIVING & STORAGE SILO (UNIT #2) INCLUDING VIBRATING BIN BOTTOM, PNEUMATIC CONVEYING SYSTEM WITH 25 HP MOTOR AND 162 SQUARE FOOT BIN VENT FILTER WITH 1 HP EXHAUST FAN AND PNEUMATIC PULSE JET BAG SHAKING SYSTEM

## **PERMIT UNIT REQUIREMENTS**

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1. Storage silo shall vent only through bin vent filter. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Bin vent filter shall have a maximum air to cloth ratio of 5 ft/min and a minimum filter area of 162 square feet. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Bin vent filter shall be equipped with an operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Only crushed limestone shall be handled. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
6. There shall be no emissions in excess of 5% opacity from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Silo shall not operate more than 7 hours/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.010 grains/dscf in concentration. [District NSR Rule] Federally Enforceable Through Title V Permit
9. PM-10 emissions shall be measured by District-witnessed sample collection by independent testing firm upon detection of visible emissions. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Permittee shall keep records of amounts and size of limestone received and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. Records of dust collector maintenance, hours of operation, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. Operator shall record the daily hours of operation for this unit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] 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:** S-75-13-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

45,886 GALLON SAND STORAGE SILO (UNIT #2) INCLUDING PNEUMATIC CONVEYING SYSTEM AND BIN VENT FILTER WITH 162 SQUARE FEET OF FILTERING AREA, 1.0 HP EXHAUST FAN AND PNEUMATIC PULSE JET BAG SHAKING SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Storage silo shall vent only through bin vent filter. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Bin vent filter shall have a maximum air to cloth ratio of 5 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Bin vent filter shall have a minimum filter area of 162 square feet. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Bin vent filter shall be equipped with an operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule] Federally Enforceable Through Title V Permit
6. There shall be no emissions in excess of 5% opacity from silo bin vent filter exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Silo shall not operate more than 7 hours/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.010 grains/dscf in concentration. [District NSR Rule] Federally Enforceable Through Title V Permit
9. PM-10 emissions shall be measured by District-witnessed sample collection by independent testing firm upon detection of visible emissions. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Permittee shall keep records of amounts and size of sand received and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

14. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Records of dust collector maintenance, hours of operation, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. Operator shall record the daily hours of operation for this unit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] 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:** S-75-16-1

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

EMERGENCY FIRE WATER PUMP POWERED BY 244 HP CUMMINS DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND POSITIVE CRANKCASE VENTILATION.

## PERMIT UNIT REQUIREMENTS

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1. Operation of the engine for maintenance and testing purposes shall not exceed 200 hours per year. [District Rule 4701 & NSR Rule] Federally Enforceable Through Title V Permit
2. Operation of the engine, for other than maintenance purposes, shall be limited to emergency use. [District Rule 4701 & NSR Rule] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing (unless voids UL or Fire Marshall certification). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District Rule 4801 & NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. If the engine exhibits visible emissions greater than 5% opacity, District-witnessed compliance testing for particulate matter emissions shall be conducted by an independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
8. The permittee shall maintain records of hours of operation and of the sulfur content of the diesel fuel used and shall make such records readily available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
10. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. If the IC engine is not fired on ARB regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, then the owner or operator shall determine the sulfur content of each delivery of diesel fuel being fired in the IC engine. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-17-1

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

EMERGENCY ELECTRICAL GENERATOR POWERED BY 830 BHP DETROIT DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND POSITIVE CRANKCASE VENTILATION.

## PERMIT UNIT REQUIREMENTS

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1. Operation of the engine for maintenance and testing purposes shall not exceed 200 hours per year. [District Rule 4701 & NSR Rule] Federally Enforceable Through Title V Permit
2. Operation of the engine, for other than maintenance purposes, shall be limited to emergency use. [District Rule 4701 & NSR Rule] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing (unless voids UL or Fire Marshall certification). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District Rule 4801 & NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. If the engine exhibits visible emissions greater than 5% opacity, District-witnessed compliance testing for particulate matter emissions shall be conducted by an independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
8. The permittee shall maintain records of hours of operation and of the sulfur content of the diesel fuel used and shall make such records readily available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
10. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. If the IC engine is not fired on ARB regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, then the owner or operator shall determine the sulfur content of each delivery of diesel fuel being fired in the IC engine. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-18-1

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

EMERGENCY ELECTRICAL GENERATOR POWERED BY 1106 BHP CATERPILLAR DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND CRANKCASE VENT CARTRIDGE FILTER.

## PERMIT UNIT REQUIREMENTS

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1. Operation of the engine for maintenance and testing purposes shall not exceed 200 hours per year. [District Rule 4701 & NSR Rule] Federally Enforceable Through Title V Permit
2. Operation of the engine, for other than maintenance purposes, shall be limited to emergency use. [District Rule 4701 and District NSR Rule] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing (unless voids UL or Fire Marshall certification). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District Rule 4801 & NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. If the engine exhibits visible emissions greater than 5% opacity, District-witnessed compliance testing for particulate matter emissions shall be conducted by an independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
8. The permittee shall maintain records of hours of operation and of the sulfur content of the diesel fuel used and shall make such records readily available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
10. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. If the IC engine is not fired on ARB regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, then the owner or operator shall determine the sulfur content of each delivery of diesel fuel being fired in the IC engine. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-75-19-1

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

UNIT ONE: 28,000 GALLON PER MINUTE CAPACITY, WOODEN, INDUCED DRAFT COUNTERFLOW COOLING TOWER INCLUDING FOUR 2-SPEED FAN MOTORS AND TWO MAIN CIRCULATION WATER PUMPS.

## PERMIT UNIT REQUIREMENTS

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1. No hexavalent chromium containing compounds shall be added to cooling tower circulation water. [District Rule 7012] Federally Enforceable Through Title V Permit
2. Total electric motor horsepower for this cooling tower shall not exceed 1440 HP. [District NSR Rule] 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:** S-75-20-1

**EXPIRATION DATE:** 08/31/2007

**SECTION:** SE25 **TOWNSHIP:** 25S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

UNIT TWO: 18,000 GALLON PER MINUTE CAPACITY, WOODEN, INDUCED DRAFT COUNTERFLOW COOLING TOWER INCLUDING TWO 2-SPEED FAN MOTORS, TWO MAIN CIRCULATION WATER PUMPS, AND TWO COMPONENT COOLING WATER CIRCULATION PUMPS.

## PERMIT UNIT REQUIREMENTS

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1. No hexavalent chromium containing compounds shall be added to cooling tower circulation water. [District Rule 7012] Federally Enforceable Through Title V Permit
2. Total electric motor horsepower for this cooling tower shall not exceed 1200 HP. [District NSR Rule] 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:** S-75-21-1

**EXPIRATION DATE:** 08/31/2007

**SECTION:** 25 **TOWNSHIP:** 25 **RANGE:** 25

**EQUIPMENT DESCRIPTION:**

EMERGENCY FUEL FEED SYSTEM INCLUDING 12'X5'X8' FUEL RECEIVING HOPPER SERVING UNITS 1 & 2, 48' SCREW CONVEYOR, AND WATER/SURFACTANT SPRAYS AT HOPPER RIM AND MATERIAL TRANSFER POINTS FROM SCREW CONVEYOR TO BELT CONVEYORS BC-8 AND BC-15

## PERMIT UNIT REQUIREMENTS

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1. Operation shall be equipped with 12' by 5' by 8' receiving hopper, 48' long screw conveyor, and water/surfactant sprays at hopper rim and material transfer points from screw conveyor to belt conveyors BC-8 and BC-15. [District NSR Rule] Federally Enforceable Through Title V Permit
2. There shall be no visible emissions of 5% opacity or greater from loading of the hopper and material transfer points. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Fabric collector #1 shall be operated whenever material is being transferred from emergency fuel system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Water/surfactant sprays shall be in operation whenever emergency fuel system is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emergency fuel system throughput shall not exceed 35 tons/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall maintain records of emergency fuel system throughput and shall make such records readily available for District inspection upon request. [District NSR Rule & Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 & Kern County Rule 404] 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.

12. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour.  
[District Rule 4202] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT C

Detailed Facility List

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**Detailed Facility Report**  
For Facility=75 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

<b>COVANTA DELANO INC</b> <b>31500 POND RD</b> <b>DELANO, CA 93215</b>	<b>FAC #</b> <b>STATUS:</b> <b>TELEPHONE:</b>	<b>S 75</b> <b>A</b> <b>2098374423</b>	<b>TYPE:</b> <b>TOXIC ID:</b>	<b>TitleV</b> <b>50067</b>	<b>EXPIRE ON:</b> <b>AREA:</b> <b>INSP. DATE:</b>	<b>08/31/2007</b> <b>5 /</b> <b>07/12</b>
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-75-1-8	Electrical generation component	999-99	1	0.00	0.00	A	FUEL RECEIVING, SCREENING & CONVEYING OPERATION INCLUDING TWO 60 TON CAPACITY TRUCK TIPPER PLATFORMS #1 AND #2 EQUIPPED WITH FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 175 TON/HR FUEL TRANSFER CONVEYOR #1 WITH BELT SCALE AND FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-1 TO DS-1, BC-9 TO BC-2, HOG-1 TO BC-2; STATION #2 SERVES POINTS BC-3 & BC-5), AND HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADERS
S-75-3-5	ELECTRICAL GEN. COMPONENT	999-99	1	0.00	0.00	A	4,400 GALLON LIMESTONE STORAGE SILO (UNIT #1), WITH VAPOR SPACE TIED IN COMMON WITH SAND SILO PTO 75-4, INCLUDING BIN VENT FILTER WITH 95 SQUARE FOOT FILTER AREA, 1 HP EXHAUST FAN, 1/4 HP BAG SHAKER MOTOR, AND PRODUCT CONVEYING BLOWER.
S-75-4-5	ELECTRICAL GEN. COMPONENT	999-99	1	0.00	0.00	A	65,828 GALLON SAND STORAGE (UNIT # 1) SILO, WITH VAPOR SPACE TIED COMMON WITH LIMESTONE SILO PTO S-75-3, INCLUDING BIN VENT FILTER WITH 120 SQ.FT. FILTER AREA, 1 HP EXHAUST FAN AND 1/4 HP BAG SHAKER MOTOR.
S-75-5-8	Electrical generation component	999-99	1	0.00	0.00	A	FUEL RECLAMATION, CONVEYING AND SCREENING OPERATION INCLUDING 45 TON/HR TRAVELING VARIABLE HEIGHT FUEL RECLAIMER WITH WATER SPRAY SYSTEM, RECLAIMER FEED TABLE, RECLAIMER CONVEYOR #6, AND AUXILIARY FUEL RECLAIM HOPPER (PHASE I) WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-9 TO BC-2, BC-10, DS-2 TO BC-8; STATION #2 SERVES TRANSFER POINTS BC-6 TO BC-7, DC-3 TO BC-7), TWO FABRIC FILTER DUST COLLECTORS (#1 AND #4) SHARED WITH PERMIT S-75-1, FABRIC FILTER DUST COLLECTOR #3, MAC 95 CYCLONE #1 AND COVERED TRUCK LOADOUT WITH WATER SPRAYS
S-75-6-28	32 MW electric power generation	3020-08A F	1	8,171.00	8,171.00	A	400 MMBTU/HR (32 MW) EPI FLUIDIZED BED, BIOMASS-FUELED BOILER (UNIT #1) WITH NH3, LIMESTONE, SODIUM BICARBONATE, AND SAND INJECTION, WITH BOILER EXHAUST VENTED TO FABRIC FILTER; AND FOUR 10 MMBTU/HR PORTABLE NATURAL GAS-FIRED REFRACTORY CURING HEATERS
S-75-7-3	ELECTRICAL GEN. COMPONENT	999-99	1	0.00	0.00	A	44,883 GALLON ASH STORAGE SILO WITH UNLOADING SPOUT, BOTH SERVED BY BIN VENT FILTER WITH 95 SQ.FT FILTER AREA AND 1/2 HP MOTOR - SILO RECEIVING MATERIAL FROM PHASE I AND PHASE II ASH HANDLING CONVEYOR

**Detailed Facility Report**  
For Facility=75 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-75-9-5	Electrical Generation Component	999-99	1	0.00	0.00	A	FUEL RECEIVING, SCREENING & CONVEYING OPERATION INCLUDING 60 TON CAPACITY TRUCK TIPPER PLATFORM, FUEL RECEIVING HOPPER W/INCLINED DRAG CONVEYOR & SPIKE ROLLER, AND 100 TON/HR FUEL RECEIVING CONVEYOR #11 W/BELT SCALE WITH FOAM DUST SUPPRESSION SYSTEM (STATION #1 SERVES TRANSFER POINTS BC-11 TO DS-3, HOG-2 TO BC-13, BC-12; STATION #3 SERVES POINTS BC-16 & BC-17), AND HIGH PRESSURE WATER SPRAY AT TRUCK UNLOADER #3
S-75-10-8	Electrical generation component	999-99	1	0.00	0.00	A	FUEL RECLAMATION, CONVEYING & SCREENING OPERATION INCLUDING 35 TON/HR TRAVELING VARIABLE HEIGHT FUEL RECLAIMER #DC-4 WITH WATER SPRAY SYSTEM AND BOOMING AND SLEWING SYSTEM (SHARED WITH S-75-9) (PHASE II) WITH FOAM DUST SUPPRESSION SYSTEM (STATION # 1 SERVES TRANSFER POINTS DS-4 TO ABORT CHUTE AND DS-4 TO BC-21; STATION # 3 SERVES TRANSFER POINTS BC-18 TO BC-20 AND BC-19 TO BC-20), FABRIC FILTER DUST COLLECTORS # 9 AND # 11, AND MAC H85 CYCLONE # 2
S-75-11-24	electric power generation	3020-08A F	1	8,171.00	8,171.00	A	315 MMBTU/HR EPI FLUIDIZED BUBBLING BED, BIOMASS-FUELED BOILER (UNIT #2) WITH NH3, LIMESTONE, SAND AND SODIUM BICARBONATE (NAHCO3) INJECTION, WITH BOILER EXHAUST VENTED TO SIX COMPARTMENT FABRIC FILTER DUST COLLECTOR; AND FOUR 10 MMBTU/HR THERMAL SOLUTIONS INCORPORATED MODEL NO. TSI-10 PORTABLE NATURAL GAS-FIRED REFRACTORY CURING HEATERS
S-75-12-2	ELECTRICAL GEN. COMPONENT	999-99	1	0.00	0.00	A	5,236 GALLON LIMESTONE RECEIVING & STORAGE SILO (UNIT #2) INCLUDING VIBRATING BIN BOTTOM, PNEUMATIC CONVEYING SYSTEM WITH 25 HP MOTOR AND 162 SQUARE FOOT BIN VENT FILTER WITH 1 HP EXHAUST FAN AND PNEUMATIC PULSE JET BAG SHAKING SYSTEM
S-75-13-2	ELECTRICAL GEN. COMPONENT	999-99	1	0.00	0.00	A	45,886 GALLON SAND STORAGE SILO (UNIT #2) INCLUDING PNEUMATIC CONVEYING SYSTEM AND BIN VENT FILTER WITH 162 SQUARE FEET OF FILTERING AREA, 1.0 HP EXHAUST FAN AND PNEUMATIC PULSE JET BAG SHAKING SYSTEM
S-75-16-1	244 bhp IC Engine	3020-10 C	1	240.00	240.00	A	EMERGENCY FIRE WATER PUMP POWERED BY 244 HP CUMMINS DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND POSITIVE CRANKCASE VENTILATION.
S-75-17-1	830 bhp IC Engine	3020-10 E	1	602.00	602.00	A	EMERGENCY ELECTRICAL GENERATOR POWERED BY 830 BHP DETROIT DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND POSITIVE CRANKCASE VENTILATION.
S-75-18-1	1106 bhp IC Engine	3020-10 F	1	749.00	749.00	A	EMERGENCY ELECTRICAL GENERATOR POWERED BY 1106 BHP CATERPILLAR DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND CRANKCASE VENT CARTRIDGE FILTER.



**Detailed Facility Report**  
For Facility=75 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-75-19-1	ELECTRICAL GEN. COMPONENT	999-99	1	0.00	0.00	A	UNIT ONE: 28,000 GALLON PER MINUTE CAPACITY, WOODEN, INDUCED DRAFT COUNTERFLOW COOLING TOWER INCLUDING FOUR 2-SPEED FAN MOTORS AND TWO MAIN CIRCULATION WATER PUMPS.
S-75-20-1	ELECTRICAL GEN. COMPONENT	999-99	1	0.00	0.00	A	UNIT TWO: 18,000 GALLON PER MINUTE CAPACITY, WOODEN, INDUCED DRAFT COUNTERFLOW COOLING TOWER INCLUDING TWO 2-SPEED FAN MOTORS, TWO MAIN CIRCULATION WATER PUMPS, AND TWO COMPONENT COOLING WATER CIRCULATION PUMPS.
S-75-21-1	20 HP EMER FUEL FEED SYSTEM	999-99	1	0.00	0.00	A	EMERGENCY FUEL FEED SYSTEM INCLUDING 12'X5'X8' FUEL RECEIVING HOPPER SERVING UNITS 1 & 2, 48' SCREW CONVEYOR, AND WATER/SURFACTANT SPRAYS AT HOPPER RIM AND MATERIAL TRANSFER POINTS FROM SCREW CONVEYOR TO BELT CONVEYORS BC-8 AND BC-15

Number of Facilities Reported: 1

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# ATTACHMENT D

District Rule 4601 Stringency Analysis

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**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 a 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.
5.0 Requirements	<b>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 F.</b>		
	<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</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</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
	lacquer sanding sealers) 5.2.2 Metallic pigmented coatings 5.2.3 Shellacs 5.2.4 Fire-retardant coatings 5.2.5 Pretreatment wash primers 5.2.6 Industrial maintenance coatings 5.2.7 Low-solids coatings 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	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. 5.2.2 Effective on and after January 1, 2011, with the exception of the 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. 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. 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	
	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,	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	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

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>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>5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the 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>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>than the SIP version of the rule.</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</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</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	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.	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.	Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	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 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.	---	This section has been removed. The operation is required to meet the lacquer VOC limit regardless of 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.
	Table of Standards (See Attachment F for Table)	Table of Standards 1 (Effective through 12/31/10) (See Attachment F for Table)	The non-SIP rule requirements are the same as the Table of Standards in the SIP

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
			<p>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.</p>
		<p>Table of Standards 2 (Effective on and after 1/1/11) (See Attachment F for Table)</p>	<p>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.</p>
<p><b>6.0 Administrative Requirements</b></p>	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 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</p>	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the 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</p>	<p>The non-SIP approved rule contain sections listed in the SIP rule plus 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>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"  6.1.4.2 "For professional use only"  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 display one or more of the descriptions listed in Section</p> <p>6.1.7.1 through 6.1.7.5.  6.1.7.1 For blocking stains.  6.1.7.2 For fire-damaged substrates.  6.1.7.3 For smoke-damaged substrates.  6.1.7.4 For water-damaged substrates.  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>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 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.  6.1.5.1 "For industrial use only"  6.1.5.2 "For professional use only"  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</p>	



Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>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> <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</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</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</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>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>6.2.4.2 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</p>	<p>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>6.2.4.2 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</p>	<p>version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>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>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, 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> <ul style="list-style-type: none"> <li>6.2.7.1 the name and mailing address of the manufacturer;</li> <li>6.2.7.2 the name, address and telephone number of a contact person;</li> <li>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</li> <li>6.2.7.4 whether the product is marketed for interior or exterior use or both;</li> <li>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</li> </ul>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>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>	
	<p>6.3 Test Methods</p> <p>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</p>	<p>6.3 Test Methods</p> <p>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>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</p>	<p>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>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>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>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>6.3.5 Fire Resistance Rating: The fire 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</p>	<p>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>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 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>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>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, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (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 1613-96, "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, Specialty 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," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.12 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," <i>BAAQMD</i></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, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (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 D1613-06, "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> <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</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p><i>Manual of Procedures</i>, 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," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (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 <i>Code of Federal Regulations</i> (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," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (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>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," <i>BAAQMD Manual of Procedures</i>, 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," <i>BAAQMD Manual of Procedures</i>, 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," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (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 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>6.3.2).</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 for Evaluating Degree of Blistering of</p>	



Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>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.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
8.0 Averaging Compliance Option	<p>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 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>		No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

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.

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# ATTACHMENT E

Table of Standards in Rule 4601

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**TABLE OF STANDARDS 1 (Effective through 12/31/10)**

Limits are expressed in grams of VOC per liter<sup>a</sup> of coating thinned to the manufacturer's maximum recommendation, excluding the volume of any water, exempt compounds, or colorant added to tint bases. Manufacturer's maximum recommendation means the maximum recommendation for thinning that is indicated on the label or lid of the coating container.

COATING CATEGORY	Effective Date: 1/1/2003
Flat Coatings	100
Nonflat Coatings	150
Nonflat - High Gloss Coatings	250
Specialty Coatings	
Antenna Coatings	530
Antifouling Coatings	400
Bituminous Roof Coatings	300
Bituminous Roof Primers	350
Bond Breakers	350
Clear Wood Coatings:	
Clear Brushing Lacquers	680
Lacquers (including lacquer sanding sealers)	550
Sanding Sealers (other than lacquer sanding sealers)	350
Varnishes	350
Concrete Curing Compounds	350
Dry Fog Coatings	400
Faux Finishing Coatings	350
Fire Resistive Coatings	350
Fire-Retardant Coatings:	
Clear	650
Opaque	350
Floor Coatings	250
Flow Coatings	420
Form-Release Compounds	250
Graphic Arts Coatings (Sign Paints)	500
High Temperature Coatings	420
Industrial Maintenance Coatings	250
Low Solids Coatings	120 <sup>b</sup>
Magnesite Cement Coatings	450
Mastic Texture Coatings	300
Metallic Pigmented Coatings	500
Multi-Color Coatings	250

**TABLE OF STANDARDS 1, continued (Effective through 12/31/10)**

<b>COATING CATEGORY</b>	<b>Effective Date: 1/1/2003</b>
Pre-Treatment Wash Primers	420
Primers, Sealers, and Undercoaters	200
Quick-Dry Enamels	250
Quick-Dry Primers, Sealers and Undercoaters	200
Recycled Coatings	250
Roof Coatings	250
Rust Preventative Coatings	400
Shellacs:	
Clear	730
Opaque	550
Specialty Primers, Sealers, and Undercoaters	350
Stains	250
Swimming Pool Coatings	340
Swimming Pool Repair and Maintenance Coatings	340
Temperature-Indicator Safety Coatings	550
Traffic Marking Coatings	150
Waterproofing Sealers	250
Waterproofing Concrete/Masonry Sealers	400
Wood Preservatives	350

a Conversion factor: one pound VOC per gallon (U.S.) = 119.95 grams VOC per liter.

b Units are grams of VOC per liter of coating, including water and exempt compounds in accordance with Section 3.27.

**TABLE OF STANDARDS 2 (Effective on and after 1/1/11)**

Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.

<b>COATING CATEGORY</b>	<b>VOC Limit (g/l) Effective 1/1/2011 through 12/31/2011<sup>2</sup></b>	<b>VOC Limit (g/l) Effective on and after 1/1/2012<sup>2</sup></b>
Flat Coatings	50	50
Nonflat Coatings	100	100
Nonflat - High Gloss Coatings	150	150
Specialty Coatings		
Aluminum Roof Coatings	400	400
Basement Specialty Coatings	400	400
Bituminous Roof Coatings	50	50
Bituminous Roof Primers	350	350
Bond Breakers	350	350
Concrete Curing Compounds	350	350
Concrete/Masonry Sealers	100	100
Driveway Sealers	50	50
Dry Fog Coatings	150	150
Faux Finishing Coatings	350	350
Fire Resistive Coatings	350	350
Floor Coatings	100	100
Form-Release Compounds	250	250
Graphic Arts Coatings (Sign Paints)	500	500
High Temperature Coatings	420	420
Industrial Maintenance Coatings	250	250
Low Solids Coatings <sup>1</sup>	120 <sup>1</sup>	120 <sup>1</sup>
Magnesite Cement Coatings	450	450
Mastic Texture Coatings	100	100
Metallic Pigmented Coatings	500	500
Multi-Color Coatings	250	250
Pre-Treatment Wash Primers	420	420
Primers, Sealers, and Undercoaters	100	100
Reactive Penetrating Sealers	350	350
Recycled Coatings	250	250
Roof Coatings	50	50
Rust Preventative Coatings	400	250

**TABLE OF STANDARDS 2 (continued) (Effective on and after 1/1/11)**

Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.

<b>COATING CATEGORY</b>	<b>VOC Limit (g/l) Effective 1/1/2011 through 12/31/2011<sup>2</sup></b>	<b>VOC Limit (g/l) Effective on and after 1/1/2012<sup>2</sup></b>
<b>Shellacs:</b>		
Clear	730	730
Opaque	550	550
Specialty Primers, Sealers, and Undercoaters	350	100
Stains	250	250
Stone Consolidants	450	450
Swimming Pool Coatings	340	340
Traffic Marking Coatings	100	100
Tub and Tile Refinish Coatings	420	420
Waterproofing Membranes	250	250
Wood Coatings	275	275
Wood Preservatives	350	350
Zinc-Rich Primers	340	340

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# ATTACHMENT F

District's Response to Changes  
Proposed by Facility

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## DISTRICT'S RESPONSE TO PROPOSED MODIFICATIONS

### A. Facility-Wide Requirements S-75-0-1

#### Condition 41

*Facility shall comply with California Health and Safety Code Sections 44300 through 44384. [District Rule 4102 and California Health and Safety Code]*

This condition relates to the prevention of nuisance conditions. According to District Policy, compliance to this provision cannot be demonstrated. This condition should be designated as not federally Enforceable. There are several similar conditions in the individual permit units. All similar conditions will be proposed to be streamlined with condition #41 in the facility-wide permit. This condition may not be required in the Title V permit, and will not be part of future compliance certifications.

**District's Response** – This condition is already designated as not federally enforceable in current facility-wide permit.

#### Condition #42

*No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]*

This condition could be streamlined with condition 41. Compliance with condition 41 would preclude a violation of condition 42. The condition is proposed to be subsumed

**District's Response** – This condition for nuisance cannot be streamlined with condition 41 as the purpose of California Health and Safety Code Sections 44300 through 44384 is known for and may be cited as the Air Toxics "Hot Spots" Information and Assessment Act.

#### Condition #43 (Proposed)

*All roads and roadways used by equipment associated with operation of boiler, fuel receiving operations and fuel reclamation operations shall be paved and maintained in good condition at all times. [District Rule 2201, 8061 and 8011], [Federally Enforceable Through Title V]*

There are multiple conditions in the various permit units that require roads to be paved and maintained in good condition at all times. The conditions appear in three fuel receiving units, two fuel reclaim units and two boiler operating units. This condition is intended to streamline those requirements into a single equivalent condition. The conditions to be subsumed by this are:

S-75-5-5 #19, S-75-9-5 #39, S-75-10-5 #35

**District's Response** – This condition has subsumed similar condition on multiple permits as requested.

Condition #44 (Proposed)

*Particulate matter collected by fabric collectors shall be accumulated in closed containers and shall be disposed of in a manner preventing entrainment in the atmosphere. [District Rule 2201], [Federally Enforceable Through Title V]*

There are multiple conditions in the various permit units that require particulate material to be accumulated in enclosed containers or disposed of in a manner preventing entrainment in the atmosphere. This condition is intended to streamline those requirements into a single equivalent condition. The conditions to be subsumed by this are:

*S-75-1-5 #24 Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit*

*S-75-1-5 #45 Particulate matter collected by fabric collector shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit*

*S-75-2-5 #24 Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit 4*

*S-75-2-5 #46 Particulate matter collected by fabric collector shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit*

*S-75-5-5 #19 Particulate matter collected by fabric collectors shall be disposed of in a manner preventing entrainment in the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit*

*S-75-9-5 #25 Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit*

*S-75-9-5 #49 Particulate matter collected by fabric collectors shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit*

*S-75-10-5 #24 Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit*

*S-75-10-5 #36 Particulate matter collected by fabric collectors shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit*

**District's Response** – The conditions similar to facility-wide permit condition #44 will be subsumed by it and the conditions specifically required for each permit units will stay on the permit. There will be more discussion further for each condition in any permit unit.

Condition #45 (Proposed)

*Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods pursuant to Rule 1081. [District Rule 1081], [Federally Enforceable Through Title V]*

This condition based on Rule 1081 is proposed to be added to the facility wide conditions. It is applicable to units throughout the permits and was a condition of the original ATCs. Since there is very little variation to the conditions, we will just list the affected conditions without repeating the requirement:

S-75-1-5 #23, S-75-2-5 #23, S-75-5-5 #16, S-75-6-24 #9, S-75-6-24 #75, S-75-7-3 #14, S-75-9-5 #24, S-75-10-5 #24, S-75-11-20#9, S-75-11-20 #68

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #45.

Condition #46 (Proposed)

*Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ;  $P$  is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ;  $P$  is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit*

This condition, based on Rule 4202, is a general prohibitory condition that is satisfied as part of every authority to construct. It is repeated in nearly every permit unit and is proposed to be streamlined in the facility-wide conditions. Compliance with this condition is universally based on reference to calculations performed for the authority to construct. Streamlining this condition does not affect the enforceability, nor relax any monitoring, reporting or recordkeeping. The following conditions are affected:

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #47.

S-75-1-5 #54, S-75-2-5 #55, S-75-5-5 #27, S-75-7-3 #23, S-75-9-5 #55, S-75-10-5 #41, S-75-12-2 #17, S-75-13-2 #17, S-75-21-1 #12

Condition 47 (Proposed)

*Particulate matter emissions from any unit shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404] Federally Enforceable Through Title V Permit*

This condition based on Rule 4201 is a general prohibitory condition that is satisfied as part of every authority to construct. It is repeated in nearly every permit unit and is proposed to be streamlined in the facility-wide conditions. Compliance with this condition is universally based on reference to calculations performed for the authority to construct. In most cases this condition is easily subsumed by other particulate limits in the permit and by reference to equipment design. Streamlining this condition does not affect the enforceability, nor relax any monitoring, reporting or recordkeeping. The following conditions are affected:

S-75-1-5 #55, S-75-2-5 #56, S-75-4-5 #14, S-75-5-5 #28, S-75-9-5 #56, S-75-10-5 #41, S-75-21-1 #11

**District's Response** – This condition has been removed from all permits and is subsumed by draft facility-wide permit condition #46.

Condition 48 (Proposed)

*Official test results and field data collected shall be submitted to the District within 60 days after collection. [District Rule 1081J Federally Enforceable Through Title V Permit*

This condition based on Rule 1081 simply required any source test results to be submitted to the District within 60 days after collection. It is repeated in several locations in the permits, including certain permits without recurring source test requirements. In some cases the 60 day submittal requirement is stated multiple times within the same unit. For example in unit S-75-6 conditions #44, #47 and #49 all refer to this requirement. The following conditions are proposed for stream lining:

S-75-6-24 #49, S-75-10-5 #34, S-75-11-20 #47, S-75-12-2 #10, S-75-13-2 #10, S-75-16-1 #7, S-75-17-1 #7, S-75-18-1 #7

In addition to streamlining conditions stipulating submittal of results, several permit units were required to perform initial source tests and to submit those results to the District. While the District may request source testing in accordance with Rule 1081 in the future, there are no recurring test requirements except for the boilers. The initial test requirements were fulfilled; therefore, the ATC conditions that refer to testing after equipment startup should be removed from the PTO conditions. This only affects two conditions:

S-75-9-5 #48 (this condition refers to non-initial testing and should be deleted since it only applies to the A TC).

S-75-10-5 #33 (this condition refers to non-initial testing and should be deleted since it only applies to the ATC).

**District's Response** – This condition can't be placed on facility-wide permit as it is not applicable to all units in the facility.

S-75-0-1 #49 (Contingency)

*Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes from any source. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)], [Federally Enforceable Through Title V]*

This condition is based on a general prohibitory condition that is satisfied as part of every authority to construct. Compliance with this condition is universally based on reference to calculations performed for the authority to construct. In most cases this condition is easily subsumed by SO<sub>2</sub> limits in the permit, limits on sulfur content in fuel, or by reference to equipment design. This condition only appears in the three diesel engine permits and is probably subsumed by other conditions in those permits, or by the IC Engine ATCM. It is proposed to be subsumed and deleted from each permit. If it is deemed appropriate to include this requirement as a general condition that is acceptable; however this general condition is only provided as a contingency against the possibility the requirement cannot be subsumed by other means.

S-75-16-1 #9 S-75-17-1 #7 S-75-18-1 #7

**District's Response** – This condition has been removed from permit unit S-75-16, -17 and -18 for engines and is replaced by more stringent condition #4 on each permit.

## **B. Fuel Receiving Phase I S-75-1-5 and S-75-2-5:**

AES Delano, Inc. has submitted an ATC application to the Southern region to modify certain conditions in S-75-1 and S-75-2 to enable the construction of a fine materials removal system. In addition to construction of the new equipment, the application also proposes the following streamlining and modifications. Of particular significance is the proposal to eliminate permit unit #2. Units 1 and 2 are identical permits its except for the inclusion of a nuisance prevention condition in S-75-2-5 at condition 42. All of the equipment is shares with the sole distinguishing feature apparently being S-75-1 includes truck tipper #1 and S-75-2 includes truck tipper #2.

The two truck tippers are served by the same fabric collector #2, and are interlocked. All of the monitoring, inspections, recordkeeping, reporting and operating requirements of all equipment and materials handled is the same and indistinguishable. Keeping two permits where one would suffice in unnecessarily burdensome to both the District and the applicant. It exposes the applicant to duplicate violations for breakdowns of the same equipment, duplicate recordkeeping and compliance certification, and multiple permit fees for the same pieces of equipment. The District maintains two permit its with 56 conditions that say the same thing, and must make each modification in duplicate. The logic of this situation is inescapable. These two permit units must be streamlined for the sake of the applicant and the District. It is hereby requested that the permit units be combined into a single regulatory document on the basis the units are interconnected, interlocked and incapable of independent operation.

The permit contains numerous conditions that are equipment descriptions. To the extent possible, it is requested that these descriptions be deleted or consolidated into the equipment description. Any modification of this equipment that would change the equipment specifications issued in the Authority to Construct would require an application and District review. The following conditions are considered to be in this "description" class: These conditions may be deleted from the PTO.

1. *Operation shall include ventilation system and fabric collector #2, with a minimum of 5, 002 sqft. filter area and 100 hp exhaust fan (shared with S-75-2), serving truck tipper, fuel receiving hopper and inlet to the fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable Through Title V Permit*
2. *Fabric collector #2 shall include 5 hp blower motor, .rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit*
3. *Operation shall include belt type magnetic separator and magnetic separator take away conveyor, both shared with S-75-2. [District NSR Rule] Federally Enforceable Through Title V Permit*

4. *Operation shall include disk type scalping screen and swing hammer type hog, both with foam dust suppression and both shared with S-75-2 and vented to fabric collector #4. [District NSR Rule]*
5. *Operation shall include ventilation system and fabric collector #4, with minimum of 2,509 sq. ft. filter area and 60 hp exhaust fan (shared with S-75-2 & S-75-5), serving disk type scalping screen, swing hammer type hog, and discharge of fuel transfer conveyor #1. [District NSR Rule] Federally Enforceable through title V Permit*
6. *Fabric collector #4 shall include 3 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit*
7. *Operation shall include 186 ton/hr capacity hog outfeed conveyor #2 with operational foam dust suppression (shared with S-75-2). [District NSR Rule]*
8. *Operation shall include 186 ton/hr capacity fixed stacker conveyor #3 with operational foam dust suppression, two position diverter gate, and telescopic spout with dust pick-up shroud (shared with S-75-2). [District NSR Rule]*
9. *Operation shall include 186 ton/hr capacity stacker infeed conveyor #4, and 186 ton/hr capacity radial stacker. [District NSR Rule] Federally Enforceable Through Title V Permit*
10. *Operation shall include ventilation system with fabric collector #3 serving items listed in conditions 1a, 11 and head of item 9 with a minimum of 3,263 sqft filter area and 125 hp exhaust fan (shared with S-75-2). [District NSR Rule] Federally Enforceable Through Title V Permit*
11. *Fabric collector #3 shall include 3 hp blower motor, rotary valve and auger. [District NSR Rule] Federally Enforceable Through Title V Permit*

**District's Response** – The district can't delete NSR conditions with Title V renewal project and require an ATC application to get these conditions modified or deleted from the permit. The permit unit under S-75-2 has been cancelled so no further discussion required for this unit.

**Condition #20**

*Scalping screen/hog area fabric collector #4 shall have minimum filter area of 2, 509 sq. ft. and maximum air-to-cloth ratio of 8 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit*

The equipment described in this condition is in the process of being modified to a filter area of 3674 square feet and 8.17 ft/minute. The ATC application has been submitted along with sufficient offsets to mitigate any emission increase.

**District's Response** – This condition was updated upon implementation of ATC S-75-1-6.

Condition #23

*Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods pursuant to Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit*

Subsume with proposed facility-wide condition #45.

**District's Response** – The district has been subsumed with proposed facility-wide condition #45.

Condition #24

*Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit*

Subsume with proposed facility-wide condition #44

**District's Response** – This condition is more detailed than facility-wide condition #44, therefore no change has been made.

Condition #27

*All ventilation system ducts shall be sized for minimum duct transport velocity of 3,200 ft/min. [District NSR Rule] Federally Enforceable Through Title V Permit*

This design condition is used for ventilations systems throughout the facility. It is a velocity determined as a calculated function of duct diameter and design air flow during review for ATC and would be burdensome to demonstrate for routine compliance certification. While this design criterion is clearly appropriate for the ATC it should be deleted from the PTO.

**District's Response** – The district can't delete NSR condition with Title V renewal project and require an ATC application to get this condition removed from permit.

Condition #29,

*Maximum average bin clearing time for each truck tipper operation shall not exceed 10 minutes per load [District NSR Rule] Federally Enforceable Through Title V Permit*

A permit modification is pending in the southern region office to delete this condition. When S75-1 was originally constructed, the hours of operation were limited to 12 hours per day. Emissions were calculated based on 7.17 hours of operation per day assuming 5-minutes/load bin clearing time.



86 trucks/day x 5 minutes/load / 60 minutes/hour = 7.17 hours/day

This in turn was used to calculate emissions from the unit at

0.01 grain/dscfx 35000 cfm x 60 x 7.1717000 grains/lb =21.5 lb/day.

The permit was later modified to allow 10 minutes/ truckload, but emissions and offsets were based on 24-hours per day of operation and 0.0045 grains/dscf emissions from FC#2. In other words, the bin clearing time has nothing to do with the hours of operation of the fabric collector which runs constantly whenever receiving operations are active. The bin clearing time is an artifact of the original ATC, and the applicant has indicated that the bin clearing times cannot be met. This is particularly a problem when the disc screen or other downstream process is clogged or experiences a breakdown that prevents any conveying of fuel from the truck dump.

Based on inspections and monitoring of bin clearing time, AES Delano determined it could not demonstrate compliance with this conditions. Since the condition is an artifact of an emissions calculation that is no longer relevant to the unit, it is requested that the condition be deleted.

**District's Response** – This condition was removed from permit upon implementation of ATC S-75-1-6.

#### Condition #40

*Any stored fuel which is burning shall be immediately segregated and extinguished [District Rule 4102 and District NSR Rule] Federally Enforceable Through Title V Permit*

This condition is based on the nuisance rule and should not be designated as federally enforceable through Title V. Fuel fires can be extremely damaging and the facility has a great deal of fire-fighting equipment, hydrants, trucks, loaders and outside assistance and mutual response agreements to ensure fires are contained and extinguished. Fires are not a part of normal facility operations, nor are they a part of New Source Review or emission calculations. This is strictly and solely a nuisance prevention condition. Fires can clearly lead to potential nuisance conditions. Emissions from fires are no more a part of our operations than they are for a refinery, factory or any other business. Subsume with S-75-0-1 #41 or designate condition as local enforcement only.

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

Condition #43

*Air flow to fabric collectors 3 and 4 shall not exceed 20,000 and 26,600 cfm respectively, and Particulate (PM-10) emissions from fabric collectors shall not exceed 0.004 gr/scf [District NSR Rule] Federally Enforceable Through Title V Permit*

AES has applied for a modification that will change the air flow for fabric collector #4 to 30,000 cfm. This condition will be modified in the near future. The following condition has been applied for:

*Air flow to fabric collectors 3 and 4 shall not exceed 20,000 and ~~26,600~~ 30,000 cfm respectively, and Particulate (PM-10) emissions from fabric collectors shall not exceed 0.004 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit*

**District's Response** – This condition was modified upon implementation of ATC S-75-1-6.

Condition #45

*Particulate matter collected by fabric collector shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit*

A new facility-wide condition S-75-0-1 #44 has been proposed which will streamline this condition.

District's Response – This condition has been subsumed with proposed facility-wide permit's condition #44.

Condition #54

*Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{1.62}$ ;  $P$  is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ;  $P$  is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit*

Condition S-75-0-1 #46 has been proposed in the facility-wide conditions to streamline this general requirement for all sources. Compliance with this condition was determined in NSR prior to issuance of the ATC, and incorporated in to the unit design.

**District's Response** – This condition has been subsumed with facility-wide permit condition #47.

Condition #55

*Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404] Federally Enforceable Through Title V Permit*

Condition S-75-0-1 #47 has been proposed in the facility-wide conditions to streamline this general requirement for all sources.

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #46.

**C. Limestone Storage Silo (Unit #1) S-75-3-5**

The Lime silo air plenum connects to the sand silo, and both are ventilated through the bin vent filter on the sand silo. The permits have nearly identical conditions and could easily be combined. There are only minor changes requested, and are nearly the same for both permits. Considering the units are interconnected and discharge through a common vent, we recommend combining the permits.

Condition #1

*Storage silo shall vent through bin vent filters located on sand storage silo S-75-3 and limestone storage silo S-75-4. [District NSR Rule], [Federally Enforceable Through Title V]*

The description is in error. The limestone silo is S-75-3 and the sand silo is S-75-4. Both permits contain the same error.

**District's Response** – The typo has been fixed to reflect the right permit units in this condition.

Condition #3

*Limestone bin vent filter shall have a maximum air to cloth ratio of 8.54 ft/min and minimum filter area of .5 square feet. [District NSR Rule], [Federally Enforceable Through Title V]*

This is a design condition specified in the ATC and may be removed from the PTO.

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

Condition #7

*Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule], [Federally Enforceable Through Title V]*

Regulating gravity is unnecessary. Please delete this condition.

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

Condition #14

Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404], [Federally Enforceable Through Title V]

Condition S-75-0-1 #47 has been proposed in the facility-wide conditions to streamline this general requirement for all sources.

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #46.

**D. Sand Storage Silo (Unit #1) S-75-4-5**

The Lime silo air plenum connects to the Sand silo, and both are ventilated through the bin vent filter on the sand silo. The permits have nearly identical conditions and could easily be combined. There are only minor changes requested, and are nearly the same for both permits.

Considering the units are interconnected and discharge through a common vent, we recommend combining the permits.

Condition #1

*Storage silo shall vent through bin vent filters located on sand storage silo S-75-3 and limestone storage silo S-75-4. [District NSR Rule], [Federally Enforceable Through Title V]*

The description is in error. The limestone silo is S-75-3 and the sand silo is S-75-4. Both permits contain the same error. This unit is receiving the emissions from S-75-3.

**District's Response** – The typo has been fixed to reflect the right permit unit in this condition.

Condition #3

*Sand storage silo bin vent filter shall have a maximum air to cloth ratio of 8 ft/min and minimum filter area of 120 square feet. [District NSR Rule], [Federally Enforceable Through Title V]*

This is a design condition specified in the ATC and may be removed from the PTO

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

Condition #6

*Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule], [Federally Enforceable Through Title V]*

Regulating gravity is unnecessary. Please delete this condition.

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

Condition #14

*Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404], [Federally Enforceable Through Title V]*

Condition S-75-0-1 #47 has been proposed in the facility-wide conditions to streamline this general requirement for all sources.

**District's Response** – This condition has been placed on facility-wide permit as condition #46 to streamline this general requirement.

### E. Unit 1 Reclaim S-75-5-5

AES Delano, Inc. has submitted an ATC application to the Southern region to modify certain conditions in S-75-5 to enable the construction of a fine materials removal system. In addition to construction of the new equipment, the application also proposes the following streamlining and modifications. The permit contains several conditions that are equipment descriptions that derive from the A TC and may be deleted in the PTO. To the extent possible, it is requested that these descriptions be deleted or consolidated into the equipment description. Any modification of this equipment that would change the equipment specifications issued in the Authority to Construct would require an application and District review.

The following conditions are considered to be in this "description" class:

1. *Operation shall include secondary feed conveyor #7 with belt scale, belt type magnetic separators, secondary disk type scalping screen, boiler feed conveyor #8, oversize conveyor #10 and distribution drag conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit*
2. *Operation shall include fuel abort bunker. [District NSR Rule] Federally Enforceable Through Title V Permit*
3. *Operation shall include overfeed return conveyor #9 [District NSR Rule] Federally Enforceable Through Title V Permit*

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

#### Condition #4

*Operation shall include fabric collector #3 (125 hp fan and 3,263 sq. ft. minimum filtering area) serving transfer point from reclaimer feed table, auxiliary fuel reclaim hopper inlet, and reclaim conveyor #6 shared with S-75-1 and '-2. [District NSR Rule] Federally Enforceable Through Title V Permit*

This equipment is already described at S-75-1-5 #21. Recommended for streamlining.

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from this permit.

Condition #6

*Operation shall include fabric collector #4 (60 hp fan and 2509 sq. ft. min. filter area) serving discharge from conveyor #7, belt separator, inlet to fixed separator and discharge from secondary disk scalping screen shared with S-75-1 and -2. [District NSR Rule] Federally Enforceable Through Title V Permit*

This equipment is already described at S-75-1-5 #22. Recommended for streamlining. This equipment is proposed to be modified as follows:

Modify Condition #6.

Operation shall include cyclone # 1 (MAC H96) fabric collector #4 (60 100 hp fan and 2509 3674 sq. ft. min. filter area) serving discharge from conveyor #7, belt separator, inlet to fixed separator and discharge from secondary disk scalping screen and aspirator shared with S-75-1 and -2. [District NSR Rule] Federally Enforceable Through Title V Permit

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from this permit.

**F. Unit 1 Boiler S-75-6-24**

The compliance plan is based on the draft issuance of S-75-6-24 in order to minimize confusion as that most recent modification of the Title V comes into effect. The new conditions allow for the use of sodium bicarbonate and portable burners for refractory cure.

Most of the non-essential equipment descriptions have already been removed. Condition 2 is an exception and is recommended to be removed from the PTO:

*2. Boiler shall be equipped with two model ABB steam turbines powering a 32 MW (gross) electrical generator. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The district can't modify NSR conditions with Title V renewal project and require an ATC application to get these conditions modified or deleted from this permit.

Condition 9

*Fabric collector exhaust stack shall be equipped with permanent stack sampling provisions (ports, platform, ladder, etc.) consistent with E.P.A. test methods and District Rule 1081 requirements. [District Rule 1081], [Federally Enforceable Through Title V]*

A facility-wide condition at S-75-0-1 #45 is proposed to subsume this condition.

**District's Response** – The district has been subsumed with proposed facility-wide condition #45.

Condition 17, 45, 46

*17. Contamination of the biomass fuel, as delivered to the boiler, shall not exceed 0.04% by weight plastics or 0.62% by weight total of the following materials: metals, plastics, paper, painted wood, particle board, wood treated with preservatives, and non-wood roofing materials (except asbestos). [District Rule 4102], [Federally Enforceable Through Title V]*

*45. Compliance with biomass fuel contamination limits shall be demonstrated by sorting a District approved 25 ton representative sample of biomass fuel in the reclaim pile upon District request. [District Rule 4102], [Federally Enforceable Through Title V]*

*46. Data collected during sorting of 25 ton sample of biomass fuel shall be in pounds of material per ton of biomass, by category as identified in fuel contamination limit condition, and official test results and field data shall be submitted within 30 days after collection. [District Rule 4102], [Federally Enforceable Through Title V]*

These conditions relate to the prevention of nuisance conditions and are evaluated upon District request (see S-75-11 #43 and 44 which are NOT Federally Enforceable). These conditions should be designated as not federally enforceable. Subsume with S-75-0-1 #41 or designate condition as local enforcement only. These conditions should be placed adjacent to each other.

**District's Response** – These conditions are already designated as not federally enforceable and these will not be placed adjacent to each other to be consistent with permit unit S-75-11.

Condition 20

*Natural gas used as fuel shall not exceed 5,691,429 std cu. ft. per day. [District NSR Rule], [Federally Enforceable Through Title V]*

This quantity of gas greatly exceeds the capacity of the startup burners in Unit 1 (15 MMBtu/hour), and conflicts with the limits in the PSD permit which are more stringent. The PSD limits Boiler 1 not consume more than 14,285.7 scf/hr of natural gas with a higher heating value of 1,050 BTU/scf. This is equivalent to 384,956.8 scf/day and is slightly higher than the maximum capacity of the startup burners assuming 1050 BTU/scf, but approximately correct for the real heating value of gas (around 997 btu/scf).



In view of the discrepancy in the permit, AES proposes to streamline the gas consumption to the more stringent level stipulated by the PSD permit at condition 96. In the event AES Delano chooses to increase the capacity factor for natural gas, the facility will be required to submit an authority to construct. The facility is in compliance with the more stringent limit in this case, and the consumption of natural gas is in fact limited by the existing equipment limitations.

**District's Response** – The district can't modify NSR conditions with Title V renewal project and require an ATC application to get these conditions modified or deleted from this permit.

#### Condition 37

*37. Excess emissions for PM10 shall be defined as any three hour period during which the average emissions of PM10, as measured by the continuous monitoring system or by a performance test, exceeds an emission limit. [District NSR Rule], [Federally Enforceable Through Title V]*

There is no continuous emission monitoring system for PM10. This condition should be consolidated with condition 39, or corrected to remove the reference to CEMS. Consolidation with condition 39 adding PM10 to the condition is the preferred alternative as follows:

*39. Excess emissions for PM10, NOx, SOx and CO for a performance test shall be defined as any three hour period during which the average emissions of PM10, NOx, SOx or CO exceed an emission limit. [District NSR Rule], [Federally Enforceable Through Title V]*

The Unit #2 permit S-75-11-20 condition 35 is written as follows, and would be a correct way of rewording the Unit 1 condition 37.

*35. Excess emissions of PM10 shall be defined as any three hour period during which the average emissions of PM10 exceeds any emission limit. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from this permit.

#### Condition 49

*Official test results and field data from compliance testing shall be submitted within 60 days after collection. [District Rule 1081], [Federally Enforceable Through Title V]*

A facility wide condition has been proposed at S-75-0-1 #48.

**District's Response** – The condition cannot be placed on facility-wide permit as it is not applicable to other permits in the facility.

Condition 50

*Permittee shall annually offset actual emissions (along with secondary emissions approved in original approval) the following pollutant emission rates in pounds per year: PM10, 219,037; SO2, 143,883 (PM impact only); NOx 283,527; VOC 54,750; CO, 614,186 through the elimination of sufficient annual tonnage of agricultural waste diverted from open burning. [District NSR Rule], [Federally Enforceable Through Title V]*

Not all emissions are required to be offset with agricultural waste diverted from open burning. This condition omits the offsets provided by ERC certificates. The original facility had a permitted NOx emission rate of 0.08 lb/MMBtu resulting in 768 lb/day of direct emissions. An additional 575.17 lb/day of secondary emissions were required to be offset. The facility surrendered emission reduction certificates with 1058 lb/day of NO x, which after being adjusted for an offset ratio of 1.2:1 subtracted 881.67 lb/day leaving an offset balance of 461.5 lb/day. Project 1010054 increased the potential NOx emissions by 192 lb/day which is reflected in the post-project daily offset balance.

ERCs from agricultural waste diverted from open burning are required to offset the net difference between the actual emissions and permanent emission reductions surrendered for the unit. The above condition does not net out this permanent offset. We feel that the permanent ERCs should be reflected in the permit along with the offset requirement.

**District's Response** – The district can't modify NSR conditions with Title V renewal project and require an ATC application to get these conditions modified or deleted from this permit.

Condition 66

*RIGHT TO ENTRY: The Regional Administrator, the head of the State Air Pollution Control Agency, the head of the responsible local air pollution control agency, and/or their authorized representatives, upon the presentation of credentials, shall be permitted: A) to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit; B) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; C) to inspect any equipment, operation, or method required in this permit; D) to sample emissions from the source. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Conditions S-75-0-1 #18-21 specifies access right for regulatory officials and inspectors. Subsume and streamline.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 68

*SEVERABILITY: The provisions of this permit are severable, and, if any provisions of this permit are held invalid, the remainder of this permit shall not be affected thereby. [PSD ATC SJ 90-01]. [Federally Enforceable Through Title V]*

Subsume and Streamline with condition S-75-0-1 #12 in facility-wide conditions.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Conditions 71 and 72

These conditions stipulate the source testing requirements and test methods from the PSD permit. They should be streamlined and subsumed by the District permit conditions at conditions 47 and 48. The methods stipulated at condition 72 are incomplete or incorrect and appear to contain administrative errors in transcription. The District specified test methods are at least equivalent and should be used to subsume this additional requirement. A full comparison is made for permit S-75-11-20 at conditions 65 and 66

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be change as proposed.

Condition 74

*PERFORMANCE TEST ACCOMMODATIONS: For performance test purposes, sampling ports, platforms, and access shall be provided by DECI on the combustion exhaust system in accordance with 40 CFR 60.8(e). [PSD; ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and Streamline with condition S-75-6-24 #10 and S-75-0-1 #45 in facility-wide conditions.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 75

*S02 EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere S02 in excess of the more stringent of 13.2 lb/hr or 18.8 ppmvd ~ 3% O2 (3hour rolling average) or 316.8 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01/ Federally Enforceable Through Title V Permit]*

Compliance schedule item. PTO limit #28 and #32 is based on BACT of 23 ppmv, 15.8 lb/hour (24-hour rolling average), and 375.8 lb/day. District BACT is based on fuel sulfur content of 0.014% sulfur with 95% conversion to SO<sub>2</sub> and 90% control of SO<sub>2</sub> with lime. The PSD basis is 0.03 lb/MMBtu or 12 lb/hour. In spite of this finding, the PSD permit was proposed with limits of 13.2 lb/hour and did not provide background information regarding the 18.8 ppm v at 3% O<sub>2</sub> emission level. A proposal to change the SO<sub>x</sub> limits to the same basis as the District permits was submitted in 1998 when the District limits were revised. AES Delano has refocused its efforts to bring this permit into line with the District PTO and is proposing a compliance schedule (attached). The facility currently complies intermittently with the PSD emission limits but does not track compliance on a 3-hour basis.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

#### Condition 76

*NOX EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere NO<sub>x</sub> (as NO<sub>2</sub>) in excess of the more stringent of 32 lb/hr or 63 ppmvd@ 3% O<sub>2</sub>(24-hour rolling average) or 767.5 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit*

Compliance schedule item. PTO Limits #29 and 31 are 0.10 lb/MMBtu, 40.00 lb/hr, 960.0 lb/day based on 0.010 lb/MMBTU. The facility applied for and received a modification from the District that redetermined BACT at 0.010 because compliance records demonstrated that the more stringent NO<sub>x</sub> limits were associated with routine violations of the NSPS visible emissions standards despite numerous modifications to correct visible emissions; including fuel feed modifications, ammonia injection modifications and chemical absorbent additions. The applicant submitted an application to modify the PSD permit in 2002. There has been no action on the application and the facility is working on current direction from EPA and Federal land managers to model the impacts of emission increases using updated models. A compliance schedule is attached that shows progress and expected completion of this task. The facility currently complies intermittently with the PSD emission limits but does not track deviations of the PSD limit.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 77

*PM10 EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere filterable PM10 in excess of the more stringent of 8.9lb/hr or 0.01 gr/dscf @ 12% CO2 (3-hour rolling average) or 213 lb/day from the stack venting the boiler.' [PSD ATC SJ 90-01] Federally Enforceable Through Title V Permit*

Subsume and streamline the limit with conditions #27 and #32. The PSD limits are based on Method 5 front-half analysis only and are identical to the filterable fraction limits of the District permit.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 78

*CO EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere CO in excess of the more stringent of 56 lb/hr or 183 ppmvd @ 3% O2 (3hour rolling average) or 1344 lb/day from the stack venting the boiler. [PSD ATC SJ 9001] Federally Enforceable Through Title V Permit*

Compliance schedule item. PTO limits are 181 ppm, 56 lb/hr (24-hour rolling average), and 344 lb/day. The PSD limit is slightly more stringent in ppmvd, but has the same numerical limits otherwise. The only difference is the 3-hour average of the PSD permit. A proposal to change the CO averaging time to the same basis as the District permits was submitted in 1998 when the District limits were revised. AES Delano has refocused its efforts to bring this permit into line with the District PTO and is proposing a compliance schedule (attached). The facility currently complies with emission well below the PSD emission limits but does not track compliance on a 3-hour basis.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 80

*BOILER HEAT INPUT: DECI shall continuously record the steam output and the steam temperature and pressure from the boiler; also, DECI shall determine the boiler efficiency annually. The heat input, as determined from the boiler efficiency and steam production rate, shall not exceed 315 MMBtu/hr. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

The condition contains an administrative error. Unit 1 is rated at 400 MMBtu/hour. This condition is written for Unit 2. Change 315 to 400. The rewriting of a single PSD condition has made these limits unnecessarily complex in the Title V permit. We encourage the District to retain the original language of the permit condition.

The applicable PSD permit condition is as follows:

The following is the condition from the PSD permit:

*On or after the date of start-up of Boiler II, DECI shall continuously record the steam output and the steam temperature and pressure from Boilers I and II; also, DECI shall determine the boiler efficiency annually. The heat input, as determined from the boiler efficiency and steam production rate, shall not exceed 400 MMBTU/hr in Boiler I, and 315 MMBTU/hr in Boiler II*

**District's Response** – The condition has heat input rating of 400 MMBtu/hr and the District can't make any other change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 81

*OFFSET RESTRICTION: If the emission limit for any of the above pollutants (SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub>, and CO) is revised, the difference between the pollutant emission limit set forth above and the lower pollutant emission limit shall not be allowed as an emission offset for future construction or modification. [PSD ATC SJ 90-0 I], [Federally Enforceable Through Title V]*

AES Delano will apply to have this condition removed from the PSD permit. It has no effect unless and until the facility is shut down or emissions reduced. The conditions assumes that all offsets are derived from agricultural waste diverted from open burning, and is consistent with the 1989 policy that was (at the time) being developed jointly by EPA CAPCOA and CARB. AES Delano is the only biomass facility that utilized permanent emission reduction credit certificates to offset its potential emissions, plus fugitive and secondary emissions not generally required to be offset under NSR. Unit #1 offset NO<sub>x</sub> emissions in the amount of 1058 lb/day before offset ratios. Unit #2 was fully offset for the initial project. This offset provision is outside of the scope of PSD and we propose to have it removed from the PSD permit.

Condition 82

*CONTINUOUS MONITORING: DECI shall maintain and operate a continuous monitoring system to measure stack gas NO<sub>x</sub>, CO, SO<sub>x</sub>, O<sub>2</sub> and Opacity in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR 60. 13 and 40 CFR 60, Appendix B, Performance Specifications 1, 2, 3, and 4). [PSDATC SJ90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with condition 11. Note that opacity monitor should be added to 11 for equivalency.

*Continuous monitoring systems for opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO, and O<sub>2</sub>, shall meet E.P.A. monitoring performance specifications appearing in 40 CFR 60.13 and 40 CFR Appendix B, Performance Specifications I. 2. 4. & 4A. [District Rule 4001], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 83

*CONTINUOUS MONITORING: DECI shall maintain and operate a continuous monitoring system to measure stack gas volumetric flow rates in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR Part 60, Appendix B, Performance Specification 6). [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with condition 12. Note AES is not required to have an emission rate monitor pursuant to NSPS requirements and the EPA condition is incorrect. The emission rate monitor is a function of NSR which is properly referenced it District condition S-75-6-24 #12

*12. Continuous monitoring system for flue gas volume flow-rate shall meet E.P.A. monitoring performance specifications appearing in 40 CFR Part 52 appendix E. [District Rule 4001], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 85

*CONTINUOUS MONITORING: Excess emissions shall be defined as any three-hour period during which the average emissions of PM<sub>10</sub>, SO<sub>2</sub>, and/or CO, as measured by the continuous monitoring system or by a performance test, exceeds the maximum emission limits. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Compliance schedule item. This condition defines excess emissions. This definition is used in condition 39; however the averaging period for SO<sub>2</sub> and CO based on CEMS is in condition 38. Once EPA has issued a permit modification this condition may be subsumed and streamlined with conditions 38 an 39.

38. *Excess emissions for NO<sub>x</sub>, SO<sub>x</sub> and CO for the continuous monitoring system shall be defined as any 24 hour period during which the average emissions of NO<sub>x</sub>, SO<sub>x</sub> or CO exceed any emission limit. [District NSR Rule], [Federally Enforceable Through Title V]*

39. *Excess emissions for PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>x</sub> and CO for a performance test shall be defined as any three hour period during which the average emissions of PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>x</sub> or CO exceed an emission limit. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 86

*86. CONTINUOUS MONITORING: Excess emissions shall be defined as any 24-hour period during which the average emissions of NO<sub>x</sub>, as measured by the continuous monitoring system or by a performance test, exceeds the NO<sub>x</sub> maximum emission limit. [PSD A TC SJ 90-01], [Federally Enforceable Through Title V]*

See Condition 85.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 88

*88. CONTINUOUS MONITORING: Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limits for the purposes of this permit except for SO<sub>2</sub> and CO 3-hour emission limits and the opacity minute limit during normal startup or shutdown: (1) Startup shall be considered that period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. (2) Shutdown shall be considered that period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 and 75%. (3) Daily emission limits apply at all times except during refractory cure. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*



Compliance schedule item. There are slight difference between condition 88 and startup and shutdown exemptions in conditions 27 to 31 and refractory cure exemptions at conditions 33 to 35. In addition, District daily emission limits are not exempted during startup and shutdown in condition 32. Once PSD conditions have been modified, the District permit limits, averaging times and excess emission definitions will be more stringent, and can be used to subsume this condition.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

#### Condition 90

*FUEL USE: Only PUC quality natural gas, biomass, sand, limestone, ammonia, air and onsite generated, dewatered cooling tower sludge shall be fired in boiler. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with condition 14. The only difference is the addition of sodium bicarbonate, which is added near the economizer and not fired in the boiler.

*Only PUC quality natural gas, biomass, sand, limestone, ammonia, air, sodium bicarbonate (NaHCO<sub>3</sub>) and on-site generated dewatered cooling tower sludge shall be introduced into boiler. [District NSR Rule & Rule 4102], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

#### Condition 91

*FUEL USE: Biomass fuel sulfur shall not exceed 0.90% dry weight and biomass fuel nitrogen shall not exceed 2.5% dry weight. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with conditions 18 and 19 or vice versa.

18. *Biomass fuel sulfur content shall not exceed 0.90% by weight on a dry basis. [District NSR Rule], [Federally Enforceable Through Title V]*
19. *Biomass fuel nitrogen content shall not exceed 2.50% by weight on a dry basis. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The condition #18 and 19 have been subsumed with PSD condition #80 on draft permit due to exactly similar requirements, without any modification to NSR and PSD condition.

Condition 92

*FUEL USE: Biomass means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removals, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips and wood waste, including clean, chipped wood products, plywood, particle board, fiberboard and wood products manufacturing wastes, wood based construction demolition materials, pallets, crates and boxes. Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal solid waste. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with condition 15.

*15. "Biomass" means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removal, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn, yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips, and wood waste. Biomass does not include material containing sewage sludge or industrial, hazardous, radioactive or municipal solid waste. [District NSR Rule & Rule 4102], [Federally Enforceable Through Title V]*

**District's Response** – The condition #15 have been subsumed with PSD condition #81 on draft permit due to similar requirements.

Condition #94

*94. FUEL USE: Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal waste. In addition, contamination of the biomass fuel shall not exceed 0.04% by weight plastics and 0.62% by weight of metals, plastics, paper, painted wood, preservative treated wood and non wood roofing materials (except asbestos). [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with condition 17 (not federally enforceable). In this case EPA copied a District permit condition that was based on the nuisance provisions, AES will inquire about having this condition removed from the PSD permit. The presence of conditions like this lends credence to the argument that EPA never actually conducted its own analysis, but fully relied on the District findings in issuing its permit.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be change as proposed.

Condition 97

*97. NEW SOURCE PERFORMANCE STANDARDS: The boiler shall meet all applicable requirements of 40 CFR 60 Subparts A and Db. [PSD ATC SJ 90-0 1], [Federally Enforceable Through Title V Permit].*

This is equivalent to condition 13 which also broadly references compliance to NSPS requirements.

*13. This facility shall comply in full with the requirements of Rule 4001 New Source Performance Standards part 60 subpart A. and subpart Db. [District Rule 4001], [Federally Enforceable Through Title V]*

**District's Response** – The condition #13 have been subsumed with PSD condition #86 on draft permit due to similar requirements.

Condition #99

*Particulate Matter emissions shall not exceed 10.0 lb/hr. [District Rule 4301], [Federally Enforceable Through Title V]*

Subsume and streamline with conditions 26 and 71. The combustion contaminates rule is a broadly applicable condition that specifies the maximum level of contaminates allowed by a unit regardless of size. We interpret it to mean the filterable particulate emissions of a boiler unit. This condition may be subsumed by conditions 26 and 71. .

*26. Particulate matter (PM 10) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.045 lb/MMBTU of filterable particulates and 14.08 lb/hr of filterable and condensable particulates. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

**G. Ash Silo S-75-7-3**

The ash silo serves both boiler units with a fully enclosed ash storage system with controlled venting and a water mixing system for discharging ash to trucks. The first three conditions are descriptive of the equipment and contain no substantive requirements. These conditions are artifacts of the ATC and may be deleted from the PTO.

1. *Phase I ash handling system shall include three boiler ash conveyors, eight --  
-baghouse rotary feeders. two baghouse conveyors, one main ash conveyor  
and one silo conveyor. [District NSR Rule], [Federally Enforceable Through  
Title V]*
2. *Phase II ash handling system shall include+*
3. *one boiler ash conveyors, six baghouse rotary feeders, two baghouse  
conveyors, one main ash conveyor and one silo conveyor. [District NSR  
Rule], [Federally Enforceable Through Title V]*
4. *Silo shall include vibrating bin, rotary feeder, bin vent filter and paddle type  
ash conditioner. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The district can't modify NSR conditions with Title V renewal project and require an ATC application to get these conditions modified or deleted from this permit.

Condition 5

5. *Material collected by bin vent filter shall fall by gravity into storage silo.  
[District NSR Rule], [Federally Enforceable Through Title V]*

Regulating gravity is unnecessary. Please delete this condition.

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from this permit.

Condition 9

9. *Only covered truck shall be loaded with ash silo contents. [District NSR  
Rule], [Federally Enforceable Through Title V]*

Trucks may be covered when they enter or exit the silo loading area; however it is impossible to load a covered truck. A modification is requested to clarify that trucks must be covered before leaving the ash loading area or upon completion of loading operations.

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from this permit.

Condition 14

14. *Bin vent filter exhaust stack shall be equipped with adequate stack  
sampling provisions (ports, platform, ladder. etc.) consistent with EPA test  
methods. [District Rule 1081], [Federally Enforceable Through Title V]*

Subsume and streamline with propose S-75-0-1 #45.

**District's Response** – This condition has been removed from this permit and subsumed with facility-wide permit condition #45.

Condition 23

*23. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ;  $P$  is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ;  $P$  is greater than 30 tons per hour. [District Rule 4202], [Federally Enforceable Through Title V]*

Subsume and streamline with propose S-75-0-1 #46.

**District's Response** – This condition has been removed from this permit and subsumed with facility-wide permit condition #47.

***H. Fuel Receiving Phase II S-75-09-05***

AES Delano, Inc. has submitted an ATC application to the Southern region to modify certain conditions in S-75-5, to enable the construction of a fine materials removal system. In addition to construction of the new equipment, the application also proposes minor streamlining and modifications. This unit is a single truck tipper and associated conveying equipment. A second truck tipper was contemplated at the time of the original application in 1992, but never installed.

The permit contains numerous conditions that are equipment descriptions. To the extent possible, it is requested that these descriptions be deleted or consolidated into the equipment description. Any modification of this equipment that would change the equipment specifications issued in the Authority to Construct would require an application and District review. The following conditions are considered to be in this "description" class: These conditions may be deleted from the PTO.

- 1 Truck tipper platform, fuel receiving hopper, and fuel receiving conveyor shall vent only to fabric collector #5. [District NSR Rule] Federally Enforceable Through Title V Permit
- 2 Fuel receiving operation shall include belt type magnetic separator #3. [District NSR Rule] Federally Enforceable Through Title V Permit
- 3 Fuel receiving operation shall be equipped with ventilation system and fabric collector #5 with a minimum filter area of 4,875 sq. ft., maximum air-to-cloth ratio of 8:1, 100 hp exhaust fan, 5.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit
- 4 Fuel receiving operation shall be equipped with disk type scalping screen and two position pneumatically operated diverter gate #5. [District NSR Rule] Federally Enforceable Through Title V Permit

- 5 Fuel receiving operation shall be equipped with swing hammer type hog with metal trap. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6 Fuel receiving operation shall be equipped with 50 ton/hr capacity disk screen overs conveyor #12 with operational foam dust suppression, 100 ton/hr capacity screen/hog discharge conveyor #13 with operational foam dust suppression, and 135 ton/hr capacity fuel transfer conveyor #14. [District NSR Rule]
- 7 Fuel receiving operation shall be equipped with ventilation systems and fabric collector #6 with a minimum filter area of 2,505 sq. ft., maximum air-to-cloth ratio of 8:1, 60 hp exhaust fan, 3.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule], [Federally Enforceable Through Title V Permit]
- 8 Fabric collector #6 shall serve disk type scalping screen, diverter gate #5, swing hammer type hog, disk screen overs conveyor #12, screen/hog discharge conveyor #13, and fuel transfer conveyor #14. [District NSR Rule] Federally Enforceable Through Title V Permit
- 9 Fuel receiving operation shall be equipped with two position pneumatically operated diverter gates number 6 and number 7. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10 Fuel receiving operation shall be equipped with 135 ton/hr capacity fixed stacker feed conveyor #17 with operational foam dust suppression. [District NSR Rule]
- 11 Fuel receiving operation fixed stacker shall be equipped with telescoping spout with dust pick-up shroud. [District NSR Rule]
- 12 Fuel receiving operation shall be equipped with 170 ton/hr capacity radial stacker feed conveyor #15. [District NSR Rule], [Federally Enforceable Through Title V Permit]
- 13 Fuel receiving operation shall be equipped with 170 ton/hr capacity radial stacker conveyor #16 with operational foam dust suppression shared with permit unit S-75-10. [District NSR Rule]
- 14 Fuel receiving operation radial stacker shall be equipped with telescoping spout with dust pick-up shroud. [District NSR Rule]
- 15 Fuel receiving operation shall be equipped with ventilation system and fabric collector #7 with minimum of 4,466 sq. ft. filter area, maximum air-to-cloth ratio of 8:1, 200 hp exhaust fan, 5.0 hp reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule], [Federally Enforceable Through Title V Permit]
- 16 Fabric collector #7 shall serve diverter gates #6 and #7, fixed stacker feed conveyor #17, fixed stacker telescoping spout, radial stacker feed conveyor #15, radial stacker conveyor #16, radial stacker telescoping spout, and equipment identified on permit S75-10. [District NSR Rule], [Federally Enforceable Through Title V Permit]
- 17 Truck tipper receiving hopper ventilation pickup points shall prevent particulate matter emissions to atmosphere. [District NSR Rule], [Federally Enforceable Through Title V Permit]

All of the above conditions have substantive requirements in other permit conditions related to operations, ventilation rates, inspections, records, and reporting. Certifying compliance with descriptive conditions from the ATC is burdensome and unnecessary.

**District's Response** – The district can't modify NSR conditions with Title V renewal project and require an ATC application to get these conditions modified or deleted from this permit.

Condition 24

*24. Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods. [District Rule 1081] Federally Enforceable Through Title V Permit*

Subsume and streamline with proposed facility-wide condition S-7S-0-1 #45.

**District's Response** – This condition has been removed from this permit and subsumed with facility-wide permit condition #45.

Condition 25

*25. Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit*

Subsume and streamline with proposed facility wide condition S-75-0-1 #44

**District's Response** – This condition is more detailed than facility-wide condition #44, therefore no change has been made.

Condition 38

*38. Any stored fuel which is burning shall be immediately segregated and extinguished. [District NSR Rule] Federal Enforceable Through Title V Permit*

This condition is based on the nuisance rule and should not be designated as federally enforceable through Title V. Fuel fires can be extremely damaging and the facility has a great deal of fire-fighting equipment, hydrants, trucks, loaders and outside assistance and mutual response agreements to ensure fires are contained and extinguished. Fires are not a part of normal facility operations, nor are they a part of New Source Review or emission calculations. This is strictly and solely a nuisance prevention condition. Fires can clearly lead to potential nuisance conditions. Emissions from fires are no more a part of our operations than they are for a refinery, factory or any other business. Subsume with S-75-0-1 #41 or designate condition as local enforcement only.

**District's Response** – This condition is a NSR condition, therefore it cannot be designated as local enforcement only.

#### Condition 39

*39. Any access roads and roadways associated with truck unloading operations shall be paved and maintained in good condition at all times. [District NSR Rule] Federal Enforceable Through Title V Permit*

Subsume and streamline to proposed facility-wide condition S-75-0-1 #43

**District's Response** – The requirements of this condition are different from the requirements of facility-wide condition #43. No change is made to this condition.

#### Condition 46

*46. Fugitive particulate matter (PM-10) emissions from fuel storage piles shall not exceed 60.81 lb/day. [District NSR Rule] Federal Enforceable Through Title V Permit*

Facility has no means to certify compliance to this condition other than to refer to calculations performed for ATC in 1992-1995. Facility operators have no control over wind velocity, and permits do not specify the physical pile criteria for compliance. It is recommended the condition be removed from the PTO as it is primarily calculation used to determine the mitigation required for the fuel yard operations.

**District's Response** – The district can't delete NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

#### Condition 47

*47. Particulate matter (PM10) emissions at fabric collector exhaust stacks shall be determined by District-witnessed sample collection by independent testing firm within 60 days after startup of this equipment. [District Rule 1081] Federal Enforceable Through Title V Permit*



This condition refers to initial source testing at the facility and is not a recurring test requirement. This ATC requirement should be removed from the PTO. The District still may request testing pursuant to District Rule 1081 should the need to retest the equipment be determined.

**District's Response** – The condition has been removed from the permit.

Condition 48

*48. Official test results and field data collected shall be submitted to the District within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit*

Subsume and streamline with proposed facility wide condition S-75-0-1 #48

**District's Response** – The condition cannot be placed on facility-wide permit as it is not applicable to other permits in the facility.

Condition 49

*49. Particulate matter collected by fabric collectors shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federal Enforceable Through Title V Permit*

Subsume and streamline with proposed facility wide condition S-75-0-1 #44

**District's Response** – This condition has been removed from this permit and subsumed with facility-wide permit condition #44.

Condition 55

*55. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ;  $P$  is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ;  $P$  is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit*

Condition S-75-0-1 #46 has been proposed in the facility-wide conditions to streamline this general requirement for all sources.

**District's Response** – This condition has been removed from this permit and subsumed with facility-wide permit condition #47.

Condition 56

*56. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 & Kern County Rule 404] Federal Enforceable Through Title V Permit*

Condition S-75-0-1 #47 has been proposed in the facility-wide conditions to streamline this general requirement for all sources.

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #46.

### **I. Fuel Reclaim Phase II S-75-10-5**

AES Delano, Inc. has submitted an ATC application to the Southern region to modify certain conditions in S-75-5, to enable the construction of a fine materials removal system. In addition to construction of the new equipment, the application also proposes minor streamlining and modifications. This unit is phase 11 fuel reclaim from the reclaimers to the boiler and associated conveying and sizing equipment.

The permit contains numerous conditions that are equipment descriptions. To the extent possible, it is requested that these descriptions be deleted or consolidated into the equipment description. Any modification of this equipment that would change the equipment specifications issued in the Authority to Construct would require an application and District review. The following conditions are considered to be in this "description" class: These conditions may be deleted from the PTO.

- 1 *Fuel reclamation operation shall be equipped with reclaimer table and reclaim transfer conveyor #19 with operational foam dust suppression. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 2 *Fuel reclamation operation shall be equipped with self-cleaning belt-type magnetic separator #4, and magnetic discharge take away conveyor #24. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 3 *Fuel reclamation operation shall be equipped with partially enclosed 35 ton/hr auxiliary reclaim hopper #DC-5 with water sprays, and inclined live chain bottom and double spike roll discharger. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 4 *Fuel reclamation operation shall be equipped with 35 ton/hr capacity auxiliary reclaimer discharge conveyor #18. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 5 *Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #7. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 6 *Fuel reclamation operation shall be equipped with 35 ton/hr capacity, secondary screenfeed conveyor #20 with operational foam dust suppression. [District NSR Rule]*
- 7 *Fuel reclamation operation shall be equipped with self cleaning, belt type, magnetic separator #5 and collection system. [District NSR Rule] Federally Enforceable Through Title V Permit*

- 8 *Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #8. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 9 *Fuel reclamation operation shall be equipped with secondary disk type, scalping screen and oversized discharge chute and bunker. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 10 *Fuel reclamation operation shall be equipped with 35 ton/hr capacity boiler feed conveyor #21 with operational foam dust suppression. [District NSR Rule]*
- 12 *Secondary scalping screen fabric collector #9 shall serve secondary screen conveyor #20, magnetic separator #5, diverter gate #8, secondary scalping screen, discharge chute and bunker, boiler feed conveyor, and beginning of fuel reclamation operation. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 13 *Fuel reclamation operation shall be equipped with boiler distribution conveyor #DC-6. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 14 *Fuel reclamation operation shall be equipped with 35 ton/hr capacity, overfeed conveyor #22. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 15 *Fuel reclamation operation shall be equipped with two position pneumatically operated diverter gate #9. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 16 *Fuel reclamation operation shall be equipped with abort bunker. [District NSR Rule] Federally Enforceable Through Title V Permit*
- 18 *Boiler area fabric collector #11 shall serve boiler distribution conveyor #DC-6, overfeed conveyor #22, diverter gate #9, abort bunker, and existing #BC-9. [District NSR Rule] Federally Enforceable Through Title V Permit*

All of the above conditions have substantive requirements in other permit conditions related to operations, ventilation rates, inspections, records, and reporting. Certifying compliance with descriptive conditions from the ATC is burdensome and unnecessary.

**District's Response** – The district can't delete NSR conditions with Title V renewal project and require an ATC application to get these conditions modified or deleted from the permit.

#### Condition 11

*II. Fuel reclamation operation shall be equipped with ventilation system and fabric collector #9 with minimum of 1500 sq. ft. filter area, maximum air-to-cloth ratio of 8.6 ft/min, 40 hp exhaust fan, reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit*

A permit application is pending to modify this unit to allow for the construction of a cyclone and to resize the fabric collector #9 as follows:

**Modify condition #11:**

Fuel reclamation operation shall be equipped with ventilation system, cyclone #2 (MAC H85) and fabric collector #9 with minimum of 1500 1832 sq. ft. filter area, maximum air flow to cloth ratio of 8.6 10.92 ft/min 40 60 hp exhaust fan, reverse air blower, air lock, air header, and screw conveyor. [District NSR Rule] Federally Enforceable Through Title V Permit

**District's Response** – This condition was updated upon implementation of ATC S-75-10-6.

Condition 23

*23. Each fabric collector exhaust stack shall be equipped with adequate stack sampling provisions (ports, platform, ladder, etc.) consistent with EPA test methods. [District Rule 1081] Federally Enforceable Through Title V Permit*

Subsume and streamline with proposed facility wide condition S-75-0-] #45

**District's Response** – The district has been subsumed with proposed facility-wide condition #45.

Condition 24

*24. Particulate matter collected by fabric collectors shall be stored in closed containers when such material is not actively being returned to the boiler via permitted conveying equipment. [District NSR Rule] Federally Enforceable Through Title V Permit*

Subsume and streamline with proposed facility wide condition S-75-0-1 #44

**District's Response** – This condition is more detailed than facility-wide condition #44, therefore no change has been made.

Condition 31

*31. Particulate matter (PM10) emissions from fabric collector #9 shall not exceed 0.0036 gr/scf, and maximum air flow shall not exceed 12,900 cfm. [District NSR Rule] Federally Enforceable Through Title V Permit*

A permit application is pending to modify this unit to allow for the construction of a cyclone and to resize the fabric collector #9 as follows: The condition could be streamlined with condition #9 to put all relevant specification in one place. This unit was originally proposed to have emissions of 0.004, but the limit was changed following initial source testing. This modification increases the capacity and restores the design emission rate. Emission offsets have been provided. Condition 31 Particulate matter (PM10) emissions from fabric collector #9 shall not exceed 0.0036 0.004 gr/scf, and maximum air flow shall not exceed 12,900 20,000 cfm. [District NSR Rule] Federally Enforceable Through Title V Permit

**District's Response** – This condition was updated upon implementation of ATC S-75-10-6.

Condition 33

*33. Particulate matter (PM10) emissions at each fabric collector exhaust stack shall be determined by District-witnessed sample collection by independent testing firm within 60 days after startup of this equipment. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit*

This condition refers to initial source testing at the facility and is not a recurring test requirement. This ATC requirement should be removed from the PTO. The District still may request testing pursuant to District Rule 1081 should the need to retest the equipment be determined.

**District's Response** – The condition has been removed from the permit.

Condition 34

*34. Official test results and field data from compliance testing shall be submitted within 60 days after collection. [District Rule 1081J Federally Enforceable Through Title V Permit*

Subsume and streamline with proposed facility wide condition S-75-0-1 #48

**District's Response** – The condition cannot be placed on facility-wide permit as it is not applicable to other permits in the facility.

Condition 35

*35. All access roads and roadways associated with fuel reclamation operation shall be paved and maintained in good condition at all times. [District NSR Rule] Federally Enforceable Through Title V Permit*

Subsume and streamline with proposed facility wide condition S-75-0-1 #43

**District's Response** – The requirements of this condition are different from the requirements of facility-wide condition #43. No change is made to this condition.

Condition 36

*36. Particulate matter collected by fabric collectors shall be disposed of in a manner preventing entrainment in atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit*

Similar to condition #24 which requires collection in an enclosed container.

Subsume and streamline with proposed facility wide condition S-75-0-1 #44.

**District's Response** – This condition has been removed from this permit and subsumed with facility-wide permit condition #44.

Condition 41

41. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit

Subsume and streamline with proposed facility wide condition S-75-0-1 #46

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #47.

Condition 42

*42. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 420J & Kern County Rule 404] Federally Enforceable Through Title V Permit*

Subsume and streamline with proposed facility wide condition S-75-0-1 #47

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #46.

**J. Boiler #2 S-75-11-20**

The compliance plan is based on the draft issuance of S-75-6-20 in order to minimize confusion as that most recent modification of the Title V comes into effect. The new conditions allow for the use of sodium bicarbonate.

Most of the non-essential equipment descriptions have already been removed. Conditions 2 through 5 are exceptions and are recommended to be removed from the PTO: More substantive conditions regarding these descriptive conditions occur elsewhere in the permit.

2. *Boiler shall be equipped with two steam turbines powering a 24.5 MW (gross) electrical generator. [District NSR Rule] Federally Enforceable Through Title V*
3. *Boiler shall be equipped with a sodium bicarbonate (NaHCO<sub>3</sub>) injection system [District Rule 2201] Federally Enforceable Through Title V Permit*
4. *Boiler shall be equipped with sand supply/reinjection system including two bucket elevators. [District NSR Rule], Federally Enforceable Through Title V*
5. *Boiler exhaust shall be served by fabric collector. [District NSR Rule], Federally Enforceable Through Title V*

**District's Response** – The district can't modify NSR conditions with Title V renewal project and require an ATC application to get these conditions modified or deleted from this permit.

Condition 9

*9. Fabric collector exhaust stack shall be equipped with permanent stack sampling provisions (ports, platform, ladder, etc.) consistent with E.P.A. test methods and District Rule 1081 requirements. [District Rule 1081], [Federally Enforceable Through Title V]*

Subsume and streamline with facility-wide condition S-75-0-1 #45.

**District's Response** – This condition has been removed from this permit and subsumed with facility-wide permit condition #45.

Condition 17

*17. Contamination of the biomass fuel, as delivered to the boiler, shall not exceed 0.04% by weight plastics or 0.62% by weight total of the following materials: metals, plastics, paper, painted wood, particle board, wood treated with preservatives, and non-wood roofing materials (except asbestos). [District Rule 4102]*

This condition relates to the prevention of nuisance conditions. This condition should be designated as not federally enforceable. Subsume with S-75-0-1 #41. This condition is not identified as federally enforceable, unlike similar conditions at S-75-6.

**District's Response** – This condition already designated as not federally enforceable and is applicable to boilers only. It cannot be subsumed with facility-wide permit condition #41, therefore no change have been made.

Conditions 43, 44

43. *Upon District request, a District approved 25 ton representative sample of biomass fuel in the reclaim pile shall be sorted. [District Rule 4102]*

44. *Data collected during sorting of 25 ton sample of biomass fuel shall be in pounds of material per ton of biomass, by category as identified in fuel contamination limit condition, and official test results and field data shall be submitted within 30 days after collection. [District Rule 4102]*

This condition relates to the prevention of nuisance conditions and is performed upon District request. These conditions should be designated as not federally enforceable. Subsume with S75-0-1 #41. This condition is not identified as federally enforceable, unlike similar conditions at S-75-6.

**District's Response** – These conditions are applicable to boilers only and it cannot be subsumed with facility-wide permit condition #41, therefore no change has been made.

Condition 47

*47. Official test results and field data from compliance testing shall be submitted within 60 days after collection. [District Rule 1081], [Federally Enforceable Through Title VI]*

Subsume and streamline with S075-0-1 #48

**District's Response** – The condition cannot be placed on facility-wide permit as it is not applicable to all permits in the facility.

Condition 48

*48. NOx emissions shall not exceed 275,920 lb in any 12 month period. [District NSR Rule] Federally Enforceable Through Title V*

This emission rate is equal to the maximum emission limit for the boiler at 8760 hours per year (NOx emissions at  $0.10 \text{ lb/MMBtu} \times 315 \text{ MMBtu/hour} \times 8760 = 275,940$ ). For all intents, these limits cannot be exceeded and should be subsumed and streamlined with NOx emission limits at conditions 28 and 31.

**District's Response** – The NOx emission rate allowed in this condition is less than maximum emission limit for the boiler at 8760 hours per year. No change is made to this condition.

Condition 52



*52. Permittee shall maintain accurate records of continuous emissions monitoring (CEM) results, dates of occurrences and duration of start-up, shutdown, malfunction, performance testing, evaluations, calibrations, checks, adjustments and maintenance, and daily records of natural gas fuel usage. [District Rule 1080 and District NSR Rule J, Federally Enforceable Through Title V]*

This condition could be streamlined with S-75-0-1 #9 or S-75-6-24 #83. Due to subtle differences in the conditions, we are simply pointing out the related conditions and have not identified this condition for streamlining.

*83. CONTINUOUS MONITORING: DECI shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. [PSD ATC SJ 9001] Federally Enforceable Through Title V*

*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 36 AES Delano, Inc. Title V Renewal Compliance Plan 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*

**District's Response** – The requirements of condition #52 and #83 on current permit are not same, this change cannot be granted.

#### Condition 60

*60. RIGHT TO ENTRY: The Regional Administrator, the head of the State Air Pollution Control Agency, the head of the responsible local air pollution control agency, and/or their authorized representatives, upon the presentation of credentials, shall be permitted: A) to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit; B) at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; C) to inspect any equipment, operation, or method required in this permit; D) to sample emissions from the source. [PSD A TC SJ 90-01], [Federally Enforceable Through Title V]*

There are slight differences between condition 59 and startup and shutdown exemptions and refractory cure exemption in conditions 38 to 41. Once PSD conditions have been modified, the District permit limits, averaging times and excess emission definitions will be more stringent, and can be used to subsume this condition.

Conditions S-75-0-1 # 18 -21 specify access right for regulatory officials and inspectors. Subsume and streamline.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 62

*62. SEVERABILITY: The provisions of this permit are severable, and, if any provisions of this permit is held invalid, the remainder of this permit shall not be affected thereby. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and Streamline with condition S-75-0-1 #12 in facility-wide conditions.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 64

*64. AIR POLLUTION CONTROL EQUIPMENT: Limestone shall be injected directly into the combustion chambers of the boiler as required to attain the emission limit for S02. Based on previous operating experience, DECI shall, to the best of its ability, anticipate periods when a high sulfur biomass fuel and/or inherently low calcium bearing biomass fuel is utilized such that the addition of limestone is required to attain the emission limits. A SNCR system utilizing ammonia injection shall be incorporated within the boilers. Ammonia shall be injected continuously during all periods of operation at a rate which results in compliance with the NOx emission limits. It is ultimately, DECI's burden to maintain S02 and NOx emissions below the limits given in this permit during all periods of operations independent of biomass fuel type and fuel availability. Biomass fuel type, availability, and/or composition can not be utilized as a rationale for excess emissions. [PSD ATC SJ 90-01] Federally Enforceable Through Title V*

Streamline and subsume with District conditions at S-75-11-20 conditions 22, 23.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 65

*65. PERFORMANCE TESTS: At times as specified by EPA, DECI shall conduct performance tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> and furnish the Kern County Air Pollution Control District and EPA a written report of the results of such tests. The tests for SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted on an annual basis and at the maximum operating capacity of the facility being tested. Upon written request (Attn: A3-3) from DEC/, EPA may approve the conducting of performance tests at a lower specified production rate. Also, upon written request from DECI, EPA may approve the deletion of a specific annual test for the combustion unit. [PSD ATC SJ 90-01]. Federally Enforceable Through Title V*

The EPA source test requirements are the same as those specified by the District, except that the dates for testing are specified by the District permit at condition 45. Source test methods are specified at condition 46, and submittal of results at condition 47.

*45. District-witnessed emission sample collection for PM<sub>10</sub>, SO<sub>x</sub>, NO<sub>x</sub> and CO (except CO during designated refractory cure days) shall be conducted by an independent testing laboratory annually 60 days prior to permit anniversary date of August 31, or within 60 days of start-up if the unit did not operate between July 3 and August 31. [District Rule 1081], [Federally Enforceable Through Title V*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 66

*66. PERFORMANCE TEST METHODS: Performance tests for the emissions of SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> shall be conducted and the results reported in accordance with the test methods set forth in 40 CFR 60, Part 60.B and Appendix A and 40 CFR Part 51 Appendix M The following test methods shall be used: a) Performance tests for the emission of SO<sub>2</sub> shall be conducted using EPA Methods 1-4, and b) Performance tests for the emissions of NO<sub>x</sub> shall be conducted using EPA Methods 1-4, and c) Performance tests for the emissions of PM<sub>10</sub> shall be conducted using EPA Method 201(a), and d) Performance tests for the emissions of CO shall be conducted using EPA Methods 1 -4 and 10. [PSD ATC SJ 90-01] Federally Enforceable Through Title V*

Subsume and streamline with condition 46. The methods stipulated at condition 66 are incomplete or incorrect and appear to contain administrative errors in transcription. The District specified test methods are at least equivalent and should be used to subsume this additional requirement.

*46. Source testing for the following parameters shall be conducted using the stated test methods: NO<sub>x</sub> -EPA Method 7 or ARB Method 100, CO - EPA Method 10 or ARB Method 100, CO<sub>2</sub> -EPA Method 3 or ARB Method 100, O<sub>2</sub> -EPA Method 3 or ARB Method 100, SO<sub>2</sub> -EPA Method 6 or ARB Method 100, PM<sub>10</sub> -EPA Methods 201A & 202 or Method 5, Stack Gas Flow Rate -EPA Method 2, Moisture Content -EPA Method 4, Ammonia -BAAQMD ST1B, & Fuel Heating Value -ASTM Method D201585 or E71 I. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 68

68. PERFORMANCE TEST ACCOMMODATIONS: For performance test purposes, sampling ports, platforms, and access shall be provided by DECI on the combustion exhaust system in accordance with 40 CFR 60.8(e). [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]

Subsume and Streamline with condition S-75-11-20 #9.and S-75-0-1 #45 in facility-wide conditions.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 69

*69. SO<sub>2</sub> EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere SO<sub>2</sub> in excess of the more stringent of 10.4 lb/hr or 18.8 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 249.61b/day from the stack venting the boiler. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Compliance schedule item. PTO limit #27 and #31 is based on BACT of 23 ppmv, 12.09lb/hour (24-hour rolling average), and 375.8 lb/day. District BACT is based on fuel sulfur content of 0.014% sulfur with 95% conversion to SO<sub>2</sub> and 90% control of SO<sub>2</sub> with lime. The PSD basis is 0.03 lb/MMBtu or 12 lb/hour. In spite of this finding, the PSD permit was proposed with limits of 13.2 lb/hour and did not provide background information regarding the 18.8 ppmv at 3% O<sub>2</sub> emission level. A proposal to change the SO<sub>x</sub> limits to the same basis as the District permits was submitted in 1998 when the District limits were revised. AES Delano has refocused its efforts to bring this permit into line with the District PTO and is proposing a compliance schedule (attached). The facility currently complies intermittently with the PSD emission limits but does not track compliance on a 3-hour basis.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 70

*70. NOX EMISSION.LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere NOx (dsN02) in excess o/the more stringent of 25.2 lb/hr or 63 ppmvd @ 3% O2 (24-hour rolling average) or 604.8 lb/day from the stack venting the boiler. [PSDATC SJ 90-01], [Federally Enforceable Through Title V]*

Compliance schedule item. PTO Limits #28 and 31 are 0.10 lb/MMBtu, 31.50 lb/hr, 756.0 lb/day based on 0.010 lb/MMBTU. The facility applied for and received a modification from the District that redetermined BACT at 0.010 because compliance records demonstrated that the more stringent NOx limits were associated with routine violations of the NSPS visible emissions standards despite numerous modifications to correct visible emissions; including fuel feed modifications, ammonia injection modifications and chemical absorbent additions. The applicant submitted an application to modify the PSD permit in 2002. There has been no action on the application and the facility is working on current direction from EPA and Federal land managers to model the impacts of emission increases using updated models. A compliance schedule is attached that shows progress and expected completion of this task. The facility currently complies intermittently with the PSD emission limits but does not track deviations of the PSD limit.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 71

*71. PM10 EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere filterable PM10 in excess of the more stringent of 7.0 lb/hr or 0.01 gr/dscf @ 12% CO2 (3-hour rolling average) or 169 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01J, [Federally Enforceable Through Title V]*

Subsume and streamline the limit with conditions #26 and #31. The PSD limits are based on Method 5 front-half analysis only and are identical to the filterable fraction limits of the District permit.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 72

*72. CO EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere CO in excess of the more stringent of 44.1 lb/hr or 183 ppmvd @ 3% O<sub>2</sub> (3-hour rolling average) or 1058.4 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01J, [Federally Enforceable Through Title V]*

Compliance schedule item. PTO Limits #30 and #31 are 183 ppm, 44.10 lb/hr (24-hour rolling average); and 1058.4 lb/day. The PSD limit has the same numerical limits. The only difference is the 3-hour average of the PSD permit. A proposal to change the CO averaging time to the same basis as the District permits was submitted in 1998 when the District limits were revised. AES Delano has refocused its efforts to bring this permit into line with the District PTO and is proposing a compliance schedule (attached). The facility currently complies with emission well below the PSD emission limits but does not track compliance on a 3-hour basis.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 75

*75, OFFSET RESTRICTION: If the emission limit for any of the above pollutants (SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub>, and CO) is revised, the difference between the pollutant emission limit set forth above and the lower pollutant emission limit shall not be allowed as an emission offset for future construction or modification. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

AES Delano will apply to have this condition removed from the PSD permit. It has no effect unless and until the facility is shut down or emissions reduced. The conditions assumes that all offsets are derived from agricultural waste diverted from open burning, and is consistent with the 1989 policy that was (at the time) being developed jointly by EPA CAPCOA and CARB. AES Delano is the only biomass facility that utilized permanent emission reduction credit certificates to offset its potential emissions, plus fugitive and secondary emissions not generally required to be offset under NSR. Unit 2 fully offset all NO<sub>x</sub>, YOC, PM, CO and SO<sub>x</sub> emissions. Only the emissions increase in NO<sub>x</sub> is offset by agricultural credit. This offset provision is outside of the scope of PSD and we propose to have it removed from the PSD permit.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 76

*76. CONTINUOUS MONITORING: DECI shall maintain and operate a continuous monitoring system to measure stack gas NO<sub>x</sub>, CO, SO<sub>x</sub>, O<sub>2</sub> and Opacity in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR 60; 13 and 40 CFR 60, Appendix B, Performance Specifications 1, 2, 3, and 4). [PSDATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with condition 11. Note that opacity monitor should be added to 11 for equivalency.

*11. Continuous monitoring systems for opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO, and O<sub>2</sub>, shall meet E.P.A. monitoring performance specifications appearing in 40 CFR 60.13 and 40 CFR Appendix B, Performance Specifications 1, 2, 4, & 4A. [40 CFR 60 Subpart Db], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 77

*77. CONTINUOUS MONITORING: DECI shall maintain and operate a continuous monitoring system to measure stack gas volumetric flow rates in the stack venting the fluidized bed boiler. The system shall meet EPA monitoring performance specification (40 CFR Part 60, Appendix B, Performance Specification 6). [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with condition 12. Note AES is not required to have an emission rate monitor pursuant to NSPS requirements and the EPA condition is incorrect. The emission rate monitor is a function of NSR which is properly referenced in District condition S-75-6-24 #12.

*12. Continuous monitoring system for flue gas volume flow-rate shall meet E.P.A. monitoring performance specifications appearing in 40 CFR Part 52 appendix E. [40 CFR 60 Subpart Db], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 79

*79. CONTINUOUS MONITORING: Excess emissions shall be defined as any three-hour period during which the average emissions of PM<sub>10</sub>, SO<sub>2</sub>, and/or CO, as measured by the continuous monitoring system or by a performance test, exceeds the maximum emission limits. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Compliance schedule item. This condition defines excess emissions. This definition is used in condition 37; however the averaging period for S02 and CO based on CEMS is in condition 36. Once EPA has issued a permit modification this condition may be subsumed and streamlined with conditions 36 an 37.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 80

*80. CONTINUOUS MONITORING: Excess emissions shall be defined as any 24-hour period during which the average emissions of NOx, as measured by the continuous monitoring system or by a performance test, exceeds the NOx maximum emission limit. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Streamline or subsume with condition 36 which is equivalent for NOx averaging time.

*36. Excess emissions of NOx, SOx, and CO as shown by the continuous monitoring system shall be defined as any 24 hour period during which the average emissions of NOx, SOx, or co exceed any emissions limit. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 82

*82. CONTINUOUS MONITORING: Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limits for the purposes of this permit except for S02 and CO 3-hour emission limits and the opacity minute limit during normal startup or shutdown: (1) Startup shall be considered that period of time during which the boiler is heated to operating temperature at steady state load from a lower temperature, not to exceed 36 hours. This does not include utility curtailment load ramping between 75 and 100%. If curing of the refractory is required after furnace repair or modification, startup time may be extended to no longer than 60 hours. (2) Shutdown shall be considered that period of time during which the boiler is allowed to cool from its operating temperature at steady state load to a lower temperature, not to exceed 8 hours. This does not include utility curtailment load ramping between 100 and 75%. (3) Daily emission limits apply at all times except during refractory cure. [PSD ATC SJ 90-0 1], [Federally Enforceable Through Title V]*



Compliance schedule item. There are slight difference between condition 82 and startup and shutdown exemptions in conditions 38 to 41 and refractory cure exemptions at condition 39. In addition, District daily emission limits are not exempted during startup and shutdown in condition 32. Once PSD conditions have been modified, the District permit limits, averaging times and excess emission definitions will be more stringent, and can be used to subsume this condition.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

#### Condition 83

*83. CONTINUOUS MONITORING: DECI shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. [PSD ATC SJ 90-01]. [Federally Enforceable Through Title VJ]*

This recordkeeping requirement may be streamlined with conditions 52 and S-75-0-1 #8.

*52. Permittee shall maintain accurate records of continuous emissions monitoring (CEM) results, dates of occurrences and duration of start-up, shutdown, malfunction, performance testing, evaluations, calibrations, checks, adjustments and maintenance, and daily records of natural gasfuel usage. [District Rule 1080 and District NSR Rule], [Federally Enforceable Through Title V]*

*8. The operator shall maintain records of required monitoring that include: J) the date, place, and time of sampling or measurement; 2) the dates) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1]. [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

#### Condition 84

*84. FUEL USE: Only PUC quality natural gas, biomass, sand, limestone, ammonia, air and onsite generated, dewatered cooling tower sludge shall be fired in boiler. [PSD ATC SJ 90-01J]. [Federally Enforceable Through Title V]*

Subsume and streamline with condition 14. The only difference is the addition of sodium bicarbonate, which is added near the economizer and not fired in the boiler. The District permit allows sodium bicarbonate; however this is added at the economizer as a filter precoat and is not actually fired or introduced in the boiler.

*14. Only PUC quality natural gas, biomass, sand, limestone, ammonia, air, sodium bicarbonate (NaHCO<sub>3</sub>) and on-site generated dewatered cooling tower sludge shall be introduced into boiler. [District Rule 4102 and District NSR Rule], [Federally Enforceable Through Title V]*

Condition 85

*85. FUEL USE: Biomass fuel sulfur shall not exceed 0.90% dry weight and biomass fuel nitrogen shall not exceed 2.5% dry weight. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Subsume and streamline with conditions 18 and 19 or vice versa.

*18. Biomass fuel sulfur content shall not exceed 0.90% by weight on a dry basis. [District NSR Rule], [Federally Enforceable Through Title V]*

*19. Biomass fuel nitrogen content shall not exceed 2.50% by weight on a dry basis. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The condition #18 and 19 have been subsumed with PSD condition #79 on draft permit due to exactly similar requirements.

Condition 86

*86. FUEL USE: Biomass means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removals, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips and wood waste, including clean, chipped wood products, plywood, particle board, fiberboard and wood products manufacturing wastes, wood based construction demolition materials, pallets, crates and boxes. Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal solid waste. [PSD ATe SJ 90-01J], [Federally Enforceable Through Title VJ]*

Subsume and streamline with condition # 15 which is equivalent.

15. "Biomass" means any organic material not derived from fossil fuels, such as agricultural crop residue, orchard prunings and removals, stone fruit pits, nut shells, cotton gin trash, cotton stalks, vineyard prunings, cull logs, eucalyptus logs, bark, lawn, yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips, and wood waste. Biomass does not include material containing sewage sludge or industrial, hazardous, radioactive or municipal solid waste. [District Rule 4102 and District NSR Rule], [Federally Enforceable Through Title V]

**District's Response** – The condition #15 have been subsumed with PSD condition #80 on draft permit due to similar requirements.

Condition 88

88. FUEL USE: Biomass shall not include material containing sewage sludge, industrial waste, hazardous waste or municipal waste. In addition, contamination of the biomass fuel shall not exceed 0.04% by weight plastics and 0.62% by weight of metals, plastics, paper, painted wood, preservative treated wood and nonwood roofing materials (except asbestos). [PSD ATC SJ 90-01J, [Federally Enforceable Through Title VJ

Subsume and streamline with condition 17 (not federally enforceable). In this case EPA copied a District permit condition that was based on the nuisance provisions. AES will inquire about having this condition removed from the PSD permit. The presence of conditions like this lends credence to the argument that EPA never actually conducted its own analysis, but fully relied on the District findings in issuing its permit.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Conditions 74 and 89 and 93

89. FUEL USE: The permittee shall continuously record the steam output from the boiler and shall annually determine boiler efficiency from the results of boiler efficiency tests. From these parameters the heat input to the boiler (on a 365 day rolling average) shall be determined and recorded. The heat input as determined from the boiler efficiency and steam production rate shall not exceed 315 MMBtu/hr. [PSD ATC SJ 9001J, [Federally Enforceable Through Title VJ

74. BOILER HEAT INPUT: DECI shall continuously record the steam output and the steam temperature and pressure from the boiler; also, DECI shall determine the boiler efficiency annually. The heat input, as determined from the boiler efficiency and steam production rate, shall not exceed 315 MMBtu/hr. [PSD ATC SJ 90-01J, [Federally Enforceable Through Title VJ

93. *FUEL USE: The total heat input into the boiler shall not exceed 315 MMBtu/hr (HHV) when firing with both biomass and natural gas. [PSD ATC SJ 90-01J, [Federally Enforceable Through Title VJ*

Streamline and consolidate these three conditions. The rewriting of a single PSD condition has made these limits unnecessarily complex in the Title V permit. We encourage the District to retain the original language of the permit condition. The applicable PSD permit condition is as follows:

*On or after the date of start-up of Boiler JI, DECI shall continuously record the steam output and the steam temperature and pressure from Boilers I and II; also, DECI shall determine the boiler efficiency annually. The heat input, as determined from the boiler efficiency and steam production rate, shall not exceed 400 mmBTU/hr in Boiler I, and 315 mmBTU/hr in Boiler II*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 90

*90. FUEL USE: The boiler shall not consume more than 142,857.1 scJ/hr of natural gas with a higher heating value of 1,050 Btu/scf through the inbed and overbed burners. [PSD ATC SJ 90-01J, [Federally Enforceable Through Title V]*

Condition 90 limits the amount of natural gas fired in in-bed burners and an over-bed burner. The fuel consumption is equal to the stated design firing rate of those burners. The condition in the PSD permit is actually as follows:

*Boiler II is equipped with a 40 mmBTU/hr overhead burner and a 110 mmBTU/hr inbed burner. Boiler I shall not consume more than 142,857.1 scJ/hr of natural gas with a higher heating value of 1,050 BTU/scf through the in bed and overbed burners. Boiler II shall not consume more than) 4,285.7 scJ/hr of natural gas with a higher heating value (HHV) of 1050 BTU/scf through the startup burner.*

Boiler #2 currently has a 15 MMBTU/hour startup burner (described and limited in Condition 91), and a 30 MMBtu/hour overhead burner. The 110 MMBtu/hour inbed burner was removed. The District permits reflect this difference. The maximum capacity of the 15 + 40 MMBTU/hour burners are 55 E+06/ 1050 scf/MMBTU = 52,380 scf/hour. The gas consumption limits in the PSD cannot possibly be exceeded and may therefore be subsumed. AES will inform EPA of the necessary changes; however the facility is in compliance with this requirement.

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 91

*91. FUEL USE: The boiler shall not consume more than 14,285.7 scJ/hr of natural gas with a higher heating value (HHV) of 1,050 Btu/scf through the startup burner. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

As discussed above, the facility design prevents this limit from being exceeded. It is not possible to individually measure the heat input to the startup burners and the overbed burners; therefore it is impossible to certify compliance with this condition except by the design limitation. The condition is recommended to be deleted and subsumed as a design limit.

Condition 92

*92. FUEL USE: The startup burner shall only be used for startup purposes. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

Streamline and subsume with condition 20. Condition 20 actually is a more stringent limit because startup is defined in the permits as the first 36 hours of operation, and may be associated with much higher feed rates of wood.

*20. Startup burner shall not operate when feed rate of biomass exceeds 20 tons per hour. [District NSR Rule], [Federally Enforceable Through Title V]*

**District's Response** – The District can't make any change to PSD condition requirements, therefore, it cannot be changed as proposed.

Condition 94

*94. NEW SOURCE PERFORMANCE STANDARDS: The boiler shall meet all applicable requirements of 40 CFR 60 Subparts A and Db. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

This is equivalent to condition 13 which also broadly references compliance to NSPS requirements.

*This facility shall comply in full with the requirements of Rule 4001 New Source Performance Standards part 60 subpart A. and subpart Db. [District Rule 4001], [Federally Enforceable Through Title V]*

**District's Response** – The District has subsumed condition #13 on current permit with PSD condition and will be placed as condition #88 on draft permit.

Condition 99

*99. Particulate Matter emissions shall not exceed 10.0 lb/hr. [District Rule 4301], [Federally Enforceable Through Title V]*

Subsume and streamline with conditions 26 and 71. The combustion contaminates rule is a broadly applicable condition that specifies the maximum level of contaminates allowed by a unit regardless of size. We interpret it to mean the filterable particulate emissions of a boiler unit. This condition may be subsumed by conditions 26 and 71.

*26. Particulate matter (PMIO) emissions, except for periods of startup and shutdown as defined in this permit, shall not exceed 0.045 lb/MMBTU of filterable particulates and 14.08 lb/hr of filterable and condensable particulates. [District NSR Rule], [Federally Enforceable Through Title V]*  
*71. PMIO EMISSION LIMIT: Boiler shall not discharge or cause the discharge into the atmosphere filterable PMIO in excess of the more stringent of 7.0 lb/hr or 0.01 gr/dscf @ 12% CO<sub>2</sub> (3-hour rolling average) or 169 lb/day from the stack venting the boiler. [PSD ATC SJ 90-01], [Federally Enforceable Through Title V]*

**District's Response** – The district can't modify NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

**K. S-75-12-25,236 Gallon Limestone Silo Unit 2**

Condition 5

*5. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule], [Federally Enforceable Through Title V]*

Regulating gravity is unnecessary. Please delete this condition.

**District's Response** – The district can't delete NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

Condition 10

*10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081], [Federally Enforceable Through Title V]*

This unit is not subject to recurring source test requirements and this condition is not needed. Stream line and subsume with S-75-0-] condition 48.

Condition 17

*17. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ;  $P$  is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ;  $P$  is greater than 30 tons per hour. [District Rule 4202]. [Federally Enforceable Through Title V]*

Condition S-75-0-1 #46 has been proposed in the facility-wide conditions to streamline this general requirement for all sources. Compliance with this condition was determined in NSR prior to issuance of the ATC, and incorporated in to the unit design.

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #47.

***L. S-75-13-2 45,886 Gallon Sand Silo Unit 2***

Condition 5

*5. Material collected by bin vent filter shall fall by gravity into storage silo. [District NSR Rule], [Federally Enforceable Through Title V]*

Regulating gravity is unnecessary. Please delete this condition.

**District's Response** – The district can't delete NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

Condition 10

*10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081], [Federally Enforceable Through Title V]*

This unit is not subject to recurring source test requirements and this condition is not needed. Streamline and subsume with S-75-0-1 condition 48.

**District's Response** – The condition will stay on this permit and it cannot be placed on facility-wide permit as it is not applicable to all permits in the facility.

Condition 17

*17. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ;  $P$  is less than or equal to 30 tons per hour, or  $E = 17.37 \times P^{0.16}$ ;  $P$  is greater than 30 tons per hour. [District Rule 4202], [Federally Enforceable Through Title V]*

Condition S-75-0-1 #46 has been proposed in the facility-wide conditions to streamline this general requirement for all sources. Compliance with this condition was determined in NSR prior to issuance of the A TC, and incorporated in to the unit design.

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #47.

#### **M. Condition S-75-16-1 Emergency Fire Water Pump 244 HP**

This unit is subject to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines CCR Title 17 Section 93115. The applicant anticipates that such conditions and limitations as required will be incorporated into this Title V permit renewal. This engine is installed for the primary purpose of providing mechanical work during emergency use and is not the source of primary power at the facility. Engine is a direct-drive Emergency Standby Fire Pump Engine. According to section (e)(1)(B) Fuel Use, Operator shall only add to the engine or any tank associated with it CARB Diesel Fuel, Alternative Diesel Fuel meeting the requirements of the Verification Procedure, an alternative fuel, CARB Diesel Fuel with additives that meets the requirements of the Verification Procedure, or any combination.

The maintenance and testing requirements of subsection (e)(2)(B)(3) do not apply to in-use emergency fire pump assemblies that are driven directly by stationary diesel-fueled CI engines and only operated the number of hours necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 25 -"Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition, which is incorporated herein by reference. This unit is already equipped with a nonresettable hour meter in compliance with (e)(4)(G) Monitoring Equipment.

The permit already contains provision for recordkeeping and reporting, and use of compliant diesel fuel, but may need minor modification to meet all recordkeeping requirements.

The following conditions are proposed to be streamlined or subsumed.

#### Condition 5

*5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201], [Federally Enforceable Through Title V]*

**District's Response** – This condition has been removed from this permit and is placed on the draft facility-wide permit as condition #46.



Condition 7

*7. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081], [Federally Enforceable Through Title V]*

Subsume and streamline with facility-wide condition S-75-0-1 #48.

**District's Response** – This condition is required to comply with condition #5 on draft permit and cannot be removed as proposed.

Condition 9

*9. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)], [Federally Enforceable Through Title V]*

Subsume and streamline with the more stringent condition 10 which clearly limits sulfur to a much lower emission rate. Newer ATCM sulfur limits may apply which are even more stringent.

*10. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.4.2), [Federally Enforceable Through Title V]*

**District's Response** – These conditions have been removed from this permit and are replaced by more stringent condition #3 on draft permit.

***N. S-75-17-1 Emergency Electric Generator 830 HP***

This unit is subject to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines CCR Title 17 Section 93115. The applicant anticipates that such conditions and limitations as required will be incorporated into this Title V permit renewal. This engine is installed for the primary purpose of providing mechanical work during emergency use and is not the source of primary power at the facility. Engine is an emergency standby engine that is installed for the primary purpose of providing electrical power during an emergency use and is not the source of primary power at the facility; and is operated to provide electrical power during and emergency use; and is operated under limited circumstances for maintenance and testing, emissions testing. According to section (e)(1)(B) Fuel Use, Operator shall only add to the engine or any tank associated with it CARB Diesel Fuel, Alternative Diesel Fuel meeting the requirements of the Verification Procedure, an alternative fuel, CARB Diesel Fuel with additives that meets the requirements of the Verification Procedure, or any combination.

The maintenance and testing requirements of subsection (e) (2) (B) (3) will limit Non-Emergency use Maintenance and Testing operation of the engine to no more than 20 hours per year. This unit is already equipped with a nonresettable hour meter in compliance with (e) (4) (G) Monitoring Equipment.

The permit already contains provision for recordkeeping and reporting, and use of emergency hours of operation, maintenance and testing hours, fuel purchase records and sulfur compliance certification.

The following conditions are proposed to be streamlined or subsumed.

Condition 5

*5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201), [Federally Enforceable Through Title V)*

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #46.

Condition 7

*7. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081), [Federally Enforceable Through Title V)*

Subsume and streamline with facility-wide condition S-75-0-1 #48.

**District's Response** – This condition is required to comply with condition #5 on draft permit and cannot be removed as proposed.

Condition 9

*9. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)], [Federally Enforceable Through Title V]*

Subsume and stream line with the more stringent condition 10 which clearly limits sulfur to a much lower emission rate. Newer ATCM sulfur limits may apply which are even more stringent.

*10. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]*

**District's Response** – These conditions have been removed from this permit and are replaced by more stringent condition #3 on draft permit.

**O. S-75-18-1 Emergency Electric Generator 1106 HP**

This unit is subject to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines CCR Title 17 Section 93115. The applicant anticipates that such conditions and limitations as required will be incorporated into this Title V permit renewal. This engine is installed for the primary purpose of providing mechanical work during emergency use and is not the source of primary power at the facility. Engine is an emergency standby engine that is installed for the primary purpose of providing electrical power during an emergency use and is not the source of primary power at the facility; and is operated to provide electrical power during and emergency use; and is operated under limited circumstances for maintenance and testing, emissions testing. According to section (e)(J)(B) Fuel Use, Operator shall only add to the engine or any tank associated with it CARB Diesel Fuel, Alternative Diesel Fuel meeting the requirements of the Verification Procedure, an alternative fuel, CARB Diesel Fuel with additives that meets the requirements of the Verification Procedure, or any combination.

The maintenance and testing requirements of subsection (e) (2) (B) (3) will limit Non-Emergency use Maintenance and Testing operation of the engine to no more than 20 hours per year. This unit is already equipped with a nonresettable hour meter in compliance with (e) (4) (G) Monitoring Equipment.

The permit already contains provision for recordkeeping and reporting, and use of emergency hours of operation, maintenance and testing hours, fuel purchase records and sulfur compliance certification.

The following conditions are proposed to be streamlined or subsumed.

Condition 5

*5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, [Federally Enforceable Through Title V]*

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #46.

Condition 7

*7. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081], [Federally Enforceable Through Title V]*

Subsume and streamline with facility-wide condition S-75-0-1 #48.

**District's Response** – This condition is required to comply with condition #5 on draft permit and cannot be removed as proposed.

Condition 9

*9. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 404 (Madera), 406 (Fresno) and 407 (6 remaining counties in the San Joaquin Valley)], [Federally Enforceable Through Title V]*

Subsume and streamline with the more stringent condition 10 which clearly limits sulfur to a much lower emission rate. Newer ATCM sulfur limits may apply which are even more stringent.

*10. If the IC engine is fired on Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.05% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]*

**District's Response** – These conditions have been removed from this permit and are replaced by more stringent condition #3 on draft permit.

***P. S-75-19-1 Cooling Tower Unit 1***

No changes or streamlining proposed

***Q. S-75-20-1 Cooling Tower Unit 2***

No changes or streamlining proposed

***R. S-75-21-1 Emergency Feed System***

This unit is a hopper that provides fuel to either boiler infeed conveyor in the event a malfunction in the fuel reclaim or screening equipment occurs. Its purpose is to keep the units operating until repairs to the fuel conveying system can be repaired. This permit has several errors and issues that have been brought to the attention of the District permit engineer. A modification will be proposed to correct conditions and limits identified below.

Condition 2

*2. There shall be no visible emissions of 5% opacity or greater from loading of the hopper and material transfer points. [District NSR Rule], [Federally Enforceable Through Title V]*

This is a batch loading operation where a front end loader drops wood fuel into the hopper. The system is equipped with water sprays and operators are trained to minimize drop height. It is impossible to not have some visible emissions during this operation. The visible emission limit of 5%, with no averaging time means that essentially no visible emissions are allowed at this operation. This limitation is inconsistent with a batch-loading operation performed in the outdoors using only water or dust suppressant for control of fugitive dust. The initial permit review identified less than ½ lb/day emissions from this operation. AES will request an additional review of the emissions and revision of the visible emission limit to 20% for 3 minutes in any hour.

**District's Response** – The district can't delete NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

#### Condition 3

*3. Fabric collector #1 shall be operated whenever material is being transferred from emergency fuel system. [District NSR Rule], [Federally Enforceable Through Title V]*

Fabric collector #1 is not associated with this process. It is permitted in Unit S-75-5 for control of the secondary screen and abort bunker. This condition should be deleted as an error.

**District's Response** – The district can't delete NSR condition with Title V renewal project and require an ATC application to get this condition modified or deleted from the permit.

#### Condition 8

*8. Dust collector system shall be thoroughly inspected annually for any evidence of particulate matter leaks and shall be repaired as needed [District Rule 2520. 9.3.2], [Federally Enforceable Through Title V]*

There are no dust collector systems associated with this unit. Delete condition

**District's Response** – The district cannot be deleted as it is used to ensure compliance with #3 on draft permit that requires fabric collector to be operated, therefore, require an ATC application to delete NSR condition along with this condition.

#### Condition 9

*9. Dust collector filters shall be thoroughly inspected at least annually when the unit is not in operation for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed [District Rule 2520, 9.3.2], [Federally Enforceable Through Title V]*

There are no dust collector systems associated with this unit. Delete condition

**District's Response** – The district cannot be deleted as it is used to ensure compliance with #3 on draft permit that requires fabric collector to be operated, therefore, require an ATC application to delete NSR condition along with this condition.

Condition 10

*10. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]*

There are no dust collector systems associated with this unit. Delete condition

**District's Response** – The district cannot be deleted as it is used to ensure compliance with #3 on draft permit that requires fabric collector to be operated, therefore, require an ATC application to delete NSR condition along with this condition.

Condition 11

*11. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 & Kern County Rule 404], [Federally Enforceable Through Title V]*

Streamline and subsume with facility-wide condition S-75-0-1 #47.

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #46.

Condition 12

*12. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$ ;  $P$  is less than or equal to 30 tons per hour, or  $E = 17.3 \times P^{0.16}$ ;  $P$  is greater than 30 tons per hour. [District Rule 4202], [Federally Enforceable Through Title V]*

Streamline and subsume with facility-wide condition S-75-0-1 #46.

**District's Response** – This condition has been removed from all other permits and is placed on draft facility-wide permit as condition #47.