



#### JUL 0 6 2016

Mr. Richard Smith Modesto Irrigation District PO Box 4060 Modesto, CA 95352

Re:

Notice of Final Action - Title V Permit Renewal

District Facility # N-2052 Project # N-1151226

Dear Mr. Smith:

The District has issued the Final Renewed Title V Permit for Modesto Irrigation District. The preliminary decision for this project was made on May 4, 2016. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

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

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely.

**Arnaud Mariollet** 

Director of Permit Services

**Enclosures** 

CC: Tung Le, CARB (w/enclosure) via email CC:

Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin Executive Director/Air Pollution Control Officer

# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

# Final Decision Title V Permit Renewal Evaluation Modesto Irrigation District N-2052

#### **TABLE OF CONTENTS**

			****
<b>I</b> .	PRO	POSAL	
11.	FAC	ILITY LOCATION	3
III.	EQUIPMENT LISTING.		3
IV.	GENERAL PERMIT TEMPLATE USAGE		
V.	SCOPE OF EPA AND PUBLIC REVIEW		
VI.	FEDERALLY ENFORCEABLE REQUIREMENTS		
VII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE		
VIII,	FEDERALLY ENFORCEABLE PERMIT REQUIREMENTS		
IX.	PERMIT SHIELD		
Χ.			
XI.	ATTA	ACHMENTS	11
	Α.	DRAFT RENEWED TITLE V OPERATING PERMIT	
	B.	PREVIOUS TITLE V OPERATING PERMIT	
	C.	DETAILED FACILITY EQUIPMENT LIST	
	D.	MODEISTO IRRIGATION DISTRICT COMMENTS	

# FINAL DECISION TITLE V PERMIT RENEWAL EVALUATION

Simple-Cycle Power Plant

Engineer: Steve Davidson

Date: June 30, 2016

Facility Number: N-2052

Facility Name: Modesto Irrigation District

Mailing Address: PO Box 4060

Modesto, CA 95352

Contact Name: Richard Smith

Phone: (209) 526-7616

Responsible Official: Richard Smith

Title: Generation manager

Project #: N-1151226

Deemed Complete: April 8, 2015

#### I. PROPOSAL

#### Initial Proposal:

Modesto Irrigation District's (MID) Title V permit was renewed on July 18, 2011. As required by District Rule 2520, the applicant is requesting that the permit be renewed within the time frames of District Rule 2520. 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 renewed 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.

#### Revised Decision:

On May 4, 2016, the District proposed to renew Modesto Irrigation District's Title V permit. On June 27, 2016, MID commented on the renewal requesting clarification, minor typographical errors, and administrative changes. After

District reviewed the comments the District revised the evaluation, and made minor changes to the permits. Listed below are summarized comments and responses:

#### Comments:

- 1) MID requests a revising to Section IX, <u>Permit Shield</u>, of the evaluations. MID initially requested the use of model templates and requests to keep all permit shields remain in place.
- 2) MID requests that all reference to the Federal NSR/PSD Permit SJ 79-16 be removed from all facility permits.
- 3) MID requests condition 25 of N-2052-1-6 and '- 2-7 have the language and accompanying regulatory reference "The 9-run tests shall be performed at highest physically achievable load of the gas turbine," (40CFR60.335(b)(7)) be removed from the permit.
- 4) MID requests condition 41 of permits N-2052-1-6 and '-2-7 include 40CFR60 Appendix B, Performance Specification 4A.

#### Response:

- 1) The District changed the wording in the evaluation's Section IX to reflect the permit shields and to leave the shields on the permits to operate
- The District will replace all references to Federal NSR/PSD Permit SJ 79-16 with District Rule 2410
- 3) The wording in condition 41, "The 9-run tests shall be performed at highest physically achievable load of the gas turbine," and the reference to 40CFR60.335(b)(7) is associated with initial start-up. The facility has passed all initial start up.
- 4) Performance Specification 4A is included in the Performance Specifications listed in condition 41along with the rule reference to District Rule 4703.

#### II. FACILITY LOCATION

The facility is located at MID's McClure Station, 639 South McClure Road in Modesto, CA.

#### III. EQUIPMENT LISTING

See Attachment C for a list of all permitted equipment at the facility.

## IV. GENERAL PERMIT TEMPLATE USAGE

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

#### Template SJV-UM-0-3 Facility Wide Umbrella

Conditions 1-6, 8-41 of facility wide permit N-2052-0-3 contain the conditions of the 0-3 umbrella template. However, conditions 1, 2, 7, 13, 19, 20, 21, and 22 permit also reference Federal NSR/PSD Permit SJ 79-16. This reference will be changed to District Rule 2410. This change does not affect the umbrella.

#### V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

Conditions 1-6, 8-41 of facility wide permit N-2052-0-3 contain these conditions of the 0-3 umbrella template and are not subject to further EPA or public review.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

#### A. Rules Updated

- District Rule 2020, <u>Exemptions</u> (amended August 18, 2011 ⇒ amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended April 21, 2011⇒ amended February 18,2016)
- 40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines (amended February 24, 2006 ⇒ amended February 27, 2014)
- 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Gas Turbines (adopted July 6, 2006 ⇒ amended march 20, 2009)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended June 25, 2013 ⇒ amended June 25, 2013)

 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction (amended June 18, 2008 ⇒ amended April 10, 2015)

#### **B.** Rules Adopted

There have been no Rules Adopted that apply to this facility.

#### C. Rules Not Updated

- District Rule 1081, <u>Source Sampling</u> (amended December 16, 1993)
- District Rule 2010, <u>Permits Required</u> (amended December 17, 1992)
- District Rule 2031, <u>Transfer of Permits</u> (amended December 17, 1992)
- District Rule 2040, <u>Applications</u> (amended December 17, 1992)
- District Rule 2070, <u>Standards for Granting Applications</u> (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, <u>Federally Mandated Operating Permits</u> (amended June 21, 2001)
- District Rule 4101, <u>Visible Emissions</u> (amended February 17, 2005)
  - District Rule 4201, <u>Particulate Matter Concentration</u> (amended December 17, 1992)
  - District Rule 4202, <u>Particulate Matter–Emission Rate</u> (amended December 17, 1992)
  - District Rule 4402, <u>Crude Oil Production Sumps</u> (amended December 17, 1992)
  - District Rule 4703, Stationary Gas Turbines (amended August 17, 2006 = amended September 20, 2007)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 8011, <u>General Requirements</u> (amended August 19, 2004)

- District Rule 8021, <u>Construction</u>, <u>Demolition</u>, <u>Excavation</u>, <u>Extraction</u>, and <u>Other Earthmoving Activities</u>
  (amended August 19, 2004)
- District Rule 8031, <u>Bulk Materials</u> (amended August 19, 2004)
- District Rule 8041, <u>Carryout and Trackout</u> (amended August 19, 2004)
- District Rule 8051, <u>Open Areas</u> (amended August 19, 2004)
- District Rule 8061, <u>Paved and Unpaved Roads</u> (amended August 19, 2004)
- District Rule 8071, <u>Unpaved Vehicle/Equipment Traffic Areas</u> (amended September 16, 2004)
- 40 CFR Part 61, Subpart M, <u>National Emission Standard for Asbestos</u> (amended July 20, 2004)
- 40 CFR Part 64, <u>Compliance Assurance Monitoring (CAM)</u> (amended October 22, 1997)
- Federal NSR/PSD Permit SJ 79-16

The Rules listed above are listed on the current Permits to Operate. The Rules have not changed since they were addressed and placed on the permits; therefore, the facility's permit is compliant with these Rules and no further discussion of these rules is required.

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains both the federally enforceable requirements as well as 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 beyond this section.

 District Rule 4102, Nuisance (adopted May 21, 1992, amended December 17, 1992)

Condition 41 on the facility-wide permit identifies the requirements of Rule 4102.

Conditions 17 and 28 on permit S-2052-1-7 and '-2-7 identify ammonia emissions requirements from CH&SC 41700, <u>Health Risk Assessment</u>.

#### A. Rules Added

No non-federally enforceable rules have been added.

#### B. Rules Updated

No non-federally enforceable rules that affect this facility have been updated since the last Title V renewal.

## VIII. FEDERALLY ENFORCEABLE PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this section will primarily address rules that have been amended or added since the issuance of the initial Title V permit.

#### A. Equipment Description

The equipment description is considered a condition for operation. Therefore, the description is enforceable :

#### Renewal PTO N-2052-1-10:

ONE (1) GENERAL ELECTRIC MODEL MS-7000-1-B GAS TURBINE ENGINE (SERIAL # 281786) SERVING A 49.5 MW ELECTRICAL GENERATOR (UNIT #1)

#### Renewal PTO N-2052-2-11:

ONE (1) GENERAL ELECTRIC MODEL MS-7000-1-B GAS TURBINE ENGINE (SERIAL # 281905) SERVING A 49.5 MW ELECTRICAL GENERATOR (UNIT #2)

## B. District Rule 2020 - Exemptions

Rule 2020 has been amended

This rule identifies emissions units that are not required to obtain an Authority to Construct or Permit to Operate. This rule also specifies the recordkeeping requirements to verify the exemption and outlines the compliance schedule for emissions units that lose the exemption after installation.

Condition 4 on the facility-wide permit identifies the requirements of Rule 2020.

## C. 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. However, this Title V permit renewal does not constitute a modification. Per section 3.26, a modification is defined as an action including at least one of the following items:

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

Therefore, the updated requirements of this rule are not applicable at this time. NSR conditions that have not been updated or removed from the permit will not addressed in this evaluation.

# D. 40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbine

Subpart Dc applies to all stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired. Therefore, this subpart applies to the turbines.

Section 60.332, paragraphs (a)(2) and (c) specify a  $NO_x$  emission limit for electric utility stationary gas turbines rated greater than 10 MMBtu/hr but less than 100 MMBtu/hr (@ LHV) as follows:

STD = 
$$0.015 \times \frac{(14.4)}{Y} + F$$

Where:

STD = allowable, ISO corrected (if required as given in 60.335(b)(1)), NOx emissions concentration (Percent by volume at 15 percent oxygen on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NOx emission allowance for fuel bound nitrogen as defined in 60.332(a)(4).

The NOx emission allowance for fuel bound nitrogen and F is not included. Therefore, it is equal to zero. Thus,

Y = 794.6 MMBtu(HHV)/hr x 909 MMBtu(LHV)/1000 MMBtu(HHV) (LHV) x  $10^6$  BTU/MMBtu x 1054.2 J/BTU x 1 KJ/1000 Joules ÷ (49.5 x  $10^6$  watts)

Y = 15.4 KJ/watt-hour = 14.4 KJ/watt-hour (per definition of Y)

Substituting F=0 and Y=14.4 into the equation for STD gives:

$$STD = 0.0075 \frac{14.4}{14.4} + 0$$

STD = 0.0075% by volume NOx @ 15% O<sub>2</sub>

Conditions 10 and 11 limit the NOx to 3.0 ppmvd @ 15%  $O_2$  (0.0003 % by volume NOx @ 15%  $O_2$ )<sup>1</sup> for natural gas and 5.0 ppmvd @ 15%  $O_2$  (0.0005 % by volume NOx @ 15%  $O_2$ ) for very low sulfur diesel.

Therefore, compliance is expected.

Section 60.332(f) states that stationary gas turbines using water or steam injection for control of NOx emissions are exempt from the NOx emission limit

 $<sup>^{1}</sup>$  % by volume = 3.0 ppmvd @ 3%  $O_2 \times 1\%$  by volume/10,000 ppmv

when ice fog is deemed a traffic hazard by the owner or operator of the gas turbine,

These gas turbines are not equipped with water or steam injection: therefore, the requirements of this section are not applicable.

Sections 60.332(g) through 60.332(l) list exemptions for the NOx emission limit.

None of the exemptions listed limit. in 60.332(g) through 60.332(1) apply to these turbines.

Section 60.333, paragraphs (a) and (b) list the following requirements:

- Emissions of sulfur dioxide shall not exceed 0.015 percent by volume (dry) @ 15% O<sub>2</sub> (150 ppmvd @ 15% O<sub>2</sub>).
- No fuel shall be burned which contains sulfur in excess of 0.8 percent by weight.

The 150 ppmvd @ 15%  $O_2$  limit specified in section 60.333, paragraph (a) is equivalent to 0.769 lb-SO<sub>x</sub>/MMBtu as follows:

$$\frac{(150 \text{ ppmvd}) \times \left(8.578 \frac{\text{ft}^3}{\text{MMBtu}}\right) \times \left(64 \frac{\text{lb} - \text{SO}_x}{\text{lb} - \text{mol}}\right) \times \left(\frac{20.9}{20.9 - 15}\right)}{\left(379.5 \frac{\text{ft}^3}{\text{lb} - \text{mol}}\right) \times \left(10^6\right)} = 0.769 \frac{\text{lb} - \text{SO}_x}{\text{MMBtu}}$$

The  $SO_x$  emissions are based on combusting PUC-regulated natural gas with a fuel sulfur content of 1.0 gr/100 scf, which results in an emission rate of 0.00285 lb- $SO_x$ /MMBtu. The proposed very low sulfur diesel fuel has a sulfur content of 15 ppmw, which is equivalent to 0.0015 lb/MMBtu. Rule compliance is expected.

**Section 60.334** list the monitoring requirements of this operation. This section was last updated ON February 24, 2006 The requirements of this section have not changed since they were addressed and placed on the permits; therefore, the facility's permit is compliant with the requirements of this section.

**Section 60.335** list the test methods and procedures for the initial source test of this operation. This Section was last modified on February 27, 2014; therefore, the permit will be evaluated and updated to ensure compliance with this section. However, the initial source test requirements have been satisfied and continued compliance is expected.

# E. 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Gas Turbines

Section 60.4305(a) states that stationary combustion turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005 are subject to this Subpart. The turbines operated by MID at the McClure site were constructed prior to this date, and have not been modified or reconstructed after February 18, 2005. Therefore, Subpart KKKK is not applicable to these turbines. No further analysis is necessary.

## F. 40 CFR Part 61, Subpart B, Servicing of Motor Vehicle Air Conditioners

The changes to 40 CFR Part 82, Subpart B have been addressed through umbrella template 0-3. The applicant has proposed the use of this umbrella template and the umbrella template conditions will be included on the facility wide permit. No further analysis is necessary.

#### G. 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction

The changes to 40 CFR Part 82, Subpart F have been addressed through umbrella template 0-3. The applicant has proposed the use of this umbrella template and the umbrella template conditions will be included on the facility wide permit. No further analysis is necessary.

#### 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. Because MID has chosen to use the general template the conditions will remain on the permits.

#### X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

#### XI. ATTACHMENTS

- A. Draft Renewal Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. Modesto Irrigation District Comments & District Responses

# ATTACHMENT A

Renewed Title V Operating Permit

FACILITY: N-2052-0-3 EXPIRATION DATE: 09/30/2020

## **FACILITY-WIDE REQUIREMENTS**

- 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 Rules 1100, 2410, Stanislaus 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 Rules 1100, 2410, Stanislaus 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 (12/20/07). [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, 9.9.1 and 9.13.1] 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. 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. In the event of changes in control or ownership, District Rule 2410 shall be binding on new owners and operators. The applicant shall notify successor of the existence of District Rule 2410 and its conditions in writing and forward a copy to the District, California Air Resources Board, and EPA. [District Rule 2031 and 2410] Federally Enforceable Through Title V Permit
- 8. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
- 9. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

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: MODESTO IRRIGATION DISTRICT Location: MCCLURE,MODESTO, CA 95352 N-2052-0-3: Jun 30 2018 8:12AM - DAY/DISOS

- 10. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 11. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 12. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 13. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rules 2410 and 2520] Federally Enforceable Through Title V Permit
- 14. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 15. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 16. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 17. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 18. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rules 2410 and 2520] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rules 2410 and 2520] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rules 2410 and 2520] Federally Enforceable Through Title V Permit
- 22. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rules 2410 and 2520] Federally Enforceable Through Title V Permit

- 23. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (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
- 24. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in 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
- 25. 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
- 26. 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
- 27. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 28. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 29. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 30. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
- 31. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
- 32. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
- 33. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
- 34. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit

- 35. 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 Rules 8071 and 8011] Federally Enforceable Through Title V Permit
- 36. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
- 37. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 38. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 39. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Stanislaus County Rules 110, 202, and 401. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
- 44. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin April 30 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
- 45. All correspondence as required by a permit condition based on District Rule 2410 shall be forwarded to: the District; Director, Air & Toxics Div. (Attn: A-3), EPA Region IX, 75 Hawthorne St. San Francisco, CA 94105; and Chief, Stationary Source Div., CARB, P.O. Box 2815, Sacramento, CA 95812. [District Rule 2410] Federally Enforceable Through Title V Permit
- 46. Compliance with permit conditions in the Title V permit shall be deemed in compliance with Federal NSR/PSD Permit SJ 79-16. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

**PERMIT UNIT: N-2052-1-10** 

EXPIRATION DATE: 09/30/2020

#### **EQUIPMENT DESCRIPTION:**

ONE (1) GENERAL ELECTRIC MODEL MS-7000-1-B GAS TURBINE ENGINE (SERIAL # 281786) SERVING A 49.5 MW ELECTRICAL GENERATOR (UNIT #1)

## PERMIT UNIT REQUIREMENTS

- 1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
- 2. All equipment shall be maintained in proper operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rules 2201 and 2410] Federally Enforceable Through Title V Permit
- 3. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve the gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The gas turbine engine and generator lube oil vents shall be equipped with mist eliminators or equivalent technology sufficient to limit the visible emissions from the lube oil vents to not exceed 5% opacity, except for a period not exceeding three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Natural gas or 15 ppmw sulfur diesel are the only fuels permitted for combustion in the turbine. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. This unit shall be fired on natural gas as defined in 40 CFR 60.331(u) which has a total sulfur content of less than or equal to 1.0 gr/100 scf. [40 CFR 60.33(b), District Rule 4201, and Stanislaus Country Rule 407] Federally Enforceable Through Title V Permit
- Fuel consumption shall be limited to 794.6 MMBtu per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The duration of all start-up and shutdown events shall not exceed 200 hours per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. The heat input to units N-2052-1 and N-2052-2 combined shall be limited to a total of 4,000,000 MMBtu/year when firing on natural gas and diesel during base load operation. The heat input to units N-2052-1 and N-2052-2 combined shall be limited to 2,000,000 MMBtu/year when firing on diesel during base load operation. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Except during start-up and shutdown periods, emissions from this unit shall not exceed any of the following limits when fired on natural gas: NOx (as NO2) 8.64 lb/hr and 3.0 ppmvd @ 15% O2; VOC (as CH4) 2.01 lb/hr and 2.0 ppmvd @ 15% O2; CO 26.29 lb/hr and 15.0 ppmvd @ 15% O2; PM10 7.5 lb/hr; or SOx 2.26 lb/hr. All emission concentration limits are based on 3-hour rolling averages. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit
- 11. Except during start-up and shutdown periods, emissions from this unit shall not exceed any of the following limits when fired on 15 ppmw sulfur diesel: NOx (as NO2) 15.31 lb/hr and 5.0 ppmvd @ 15% O2; VOC (as CH4) 2.14 lb/hr and 2.0 ppmvd @ 15% O2; CO 27.97 lb/hr and 15.0 ppmvd @ 15% O2; PM10 20.00 lb/hr; or SOx 1.19 lb/hr. All emission concentration limits are based on 3-hour rolling averages. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit

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

Facility Name: MODESTO IRRIGATION DISTRICT Location: MCCLURE,MODESTO, CA 95352 N:2052-1-10: Jun 30 2016 &12AM - DAYDISOS

- 12. Except during start-up and shutdown periods, NOx emissions from this unit shall not exceed the heat input weighted average of the applicable ppmvd or hourly limits when fired simultaneously on natural gas and 15 ppmw sulfur diesel, as calculated by the following equation: Weighted Average Limit = [(NOx limit for gaseous fuel x heat input from gaseous fuel) + (NOx limit for liquid fuel x heat input for liquid fuel)]/(heat input for gaseous fuel + heat input from liquid fuel). All emission concentration limits are based on 3-hour rolling averages. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. The emissions during start-up and shutdown periods shall not exceed 40 lb NOx (as NO2)/hr and 100 lb CO/hr when firing on natural gas or diesel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Start-up period is defined as the period of time during which the unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. The start-up period shall not exceed two hours for each start-up. [District Rule 4703, 3.24] Federally Enforceable Through Title V Permit
- 15. Shutdown is defined as the period beginning with the initiation of the turbine shutdown sequence and ending with the cessation of the firing of the turbine. The shutdown period shall not exceed two hours for each shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
- 16. The ammonia emissions shall not exceed either of the following limits: 11.4 lb/hr or 10.0 ppmvd @ 15% O2 based on a 24-hour rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: (ppmvd @ 15% O2) = (1,000,000 x a/b c) x d, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NOx concentration ppmvd @ 15% O2 across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; 2.) utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O2. If this option is chosen, the permittee shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation; 3.) Alternatively, the permittee may utilize a continuous in-stack ammonia monitor to verify compliance with the ammonia emissions limit. If this option is chosen, the permittee shall submit a monitoring plan for District approval at least 60 days prior to commencement of operation. [District Rule 4102] Federally Enforceable Through Title V Permit
- 18. Emission rates shall not exceed any of the following limits: NOx (as NO2) 441.5 lb/day; VOC 51.4 lb/day; CO 887.4 lb/day; PM10 480.0 lb/day; or SOx (as SO2) 54.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Emissions from units N-2052-1 and N-2052-2 combined shall not exceed any of the following limits: NOx (as NO2) 76,282 lb/year; VOC 11,302 lb/year, CO 176,572 lb/year, PM10 77,218 lb/year; or SOx 12,281 lb/year. All annual emission limits are based on twelve consecutive month rolling emissions totals. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Each 3-hour rolling average will be compiled from the three most recent one hour periods. Each 1-hour period shall commence on the hour. Each 1-hour period in a 24-hour average for ammonia slip will commence on the hour. The 24-hour average will be calculated starting and ending at twelve-midnight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Daily emissions will be compiled for a 24-hour period starting and ending at twelve-midnight. Each calendar month in a twelve consecutive month rolling emissions total will commence at the beginning of the first day of the month. The twelve consecutive month rolling emissions totals to determine compliance with annual emission limits will be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Source testing to measure NOx, CO, VOC, PM10 and ammonia emissions shall be conducted at least once every twelve months. NOx, CO, VOC and ammonia emissions shall be reported in ppmvd @ 15% O2 and lb/hr, and PM10 emissions shall be reported in lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

- 23. Source testing to measure the start-up NOx emission rate shall be conducted at least once every seven years. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] Federally Enforceable Through Title V Permit
- 25. Emission concentrations shall be measured using the following test methods: EPA Methods 7E or 20 for NOx emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. [District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3] Federally Enforceable Through Title V Permit
- 26. VOC emissions (referenced as methane) shall be determined using EPA method 18 or EPA method 25. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 27. PM10 emissions shall be determined using EPA methods 201 and 202, EPA methods 201A and 202, EPA Method 5 or CARB Method 5 (total particulates). [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 28. Ammonia emissions shall be determined using BAAQMD method ST-1B. [District Rules 1081 and 4102] Federally Enforceable Through Title V Permit
- 29. The higher heating value and lower heating value of distillate fuels shall be determined using ASTM D240-87 or ASTM D2382-88. [District Rule 4703] Federally Enforceable Through Title V Permit
- The higher heating value and lower heating value of gaseous fuels shall be determined using ASTM D3588-91, ASTM 1826-88, or ASTM 1945-81. [District Rule 4703] Federally Enforceable Through Title V Permit
- 31. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
- 32. The District must be notified 30 days prior to any source testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
- 33. Source testing shall be witnessed or authorized by District personnel. Test results must be submitted to the District within 60 days of source testing. [District Rule 1081, 7.2 & 7.3] Federally Enforceable Through Title V Permit
- 34. EPA approved alternative source testing methods will be allowed, upon District approval, provided it does not result in a relaxation of emission limitations. The request to utilize EPA approved alternative source testing methods must be submitted in writing and written approval received from the District prior to the submission of the source test plan. [District Rules 1081 and 4001] Federally Enforceable Through Title V Permit
- 35. If the turbine is fired on noncertified diesel fuel, then the sulfur content of the liquid fuel being fired in the unit shall be determined using ASTM D 129-00, D 2622-98, D 4294-02, D 1266-98, D 5453-00 or D 1552-01. [District Rule 2520, 9.3.2 and 40 CFR 60.335(10)(i)] Federally Enforceable Through Title V Permit
- 36. If the turbine is not fired on certified 15 ppmw sulfur diesel fuel, the sulfur content shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(h)(4)] Federally Enforceable Through Title V Permit
- 37. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the 15 ppmw sulfur content diesel fuel requirement shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 38. The sulfur content of natural gas shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six months. If any six month monitoring show an exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3) and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

- 39. The owner or operator shall certify, maintain, operate, and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO, and O2 concentrations. The CEM shall be capable of monitoring emissions during startups and shutdowns as well as during normal operating conditions. [40 CFR 60.334 (b) and District Rules 4703, 6.2.1, 2201, & 1080] Federally Enforceable Through Title V Permit
- 40. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(2) and District Rule 1080, 6.4] Federally Enforceable Through Title V Permit
- 41. The NOx, CO, and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4A or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rules 1080 and 4703] Federally Enforceable Through Title V Permit
- 42. The CEMS shall be linked to a data logger which is compatible with the District's Data acquisition system and shall make CEM Data available to the District's automated polling system on a daily basis. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 43. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 44. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emission measurements. [40 CFR 60.7(b) and District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
- 45. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The reports is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [40 CFR 60.334(j), (j)(5), 60.7(c), 60.7(d), and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
- 46. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit
- 47. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 48. Results of the CEMS shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1 & 6.4] Federally Enforceable Through Title V Permit
- 49. In accordance with 40 CFR, Part 60, Appendix F, 5.1, cylinder gas audits (CGA) or relative accuracy audits (RAA) of continuous emission monitors shall be conducted quarterly, except during quarters in which a relative accuracy test audit (RATA) is performed. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit

- 50. The owner/operator shall perform a RATA as specified by 40 CFR Part 60, Appendix F, 5.11, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 51. The permittee shall monitor and record the fuel flow rate, NOx emission rate, CO emission rate, ammonia injection rate, exhaust temperature both prior to and after the SCR system, exhaust oxygen content and exhaust flow rate. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit
- 52. Owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, total hours of operation, type and quantity of fuel used. [District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
- 53. The permittee shall maintain the following records: date and time, duration, and type of any start-up, shutdown, or malfunction; source testing, evaluations, calibrations, checks, adjustments, any period which a continuous monitoring system or device was inoperative, and maintenance of any continuous emission monitoring system or device. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. The facility's operating and alarm logs must be available at the time of inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Owner or operator shall keep the following records: (1) A record of the 12-month rolling combined NOx, VOC, CO, PM10, and SOx emissions for units N-2052-1 and N-2052-2, in (lb/year). This record shall be updated on at least a monthly basis, (2) A record of the total combined annual heat input for units N-2052-1 and N-2052-2. This record shall be updated on at least a monthly basis, (3) A record of the combined annual heat input for units N-2052-1 and N-2052-2, when firing on diesel fuel. This record shall be updated on at least a monthly basis, and (4) A record of the annual total duration of all start-up and shutdown events for this turbine. [District Rule 2520] Federally Enforceable Through Title V Permit
- 56. All records required to be maintained by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 4703] Federally Enforceable Through Title V Permit
- 57. The requirements of the Acid Rain Program do not apply to this source because this is a simple combustion turbine that commenced commercial operation before November 15, 1990. A permit shield is granted from this requirement. [40 CFR 72.6(b)(1) and District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 58. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 407 (Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 59. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332 (a)(1), (h)(3), (j), (j)(1)(iii), and (j)(5). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 60. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8, 60.13, and District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 6.6, 7.1, 7.2, 7.3, 8.0, and 11.0; 1081(as amended 12/16/93), Sections 3.0, 6.0, 7.1, 7.2, and 7.3; and 4201 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** N-2052-2-11

**EXPIRATION DATE: 09/30/2020** 

#### **EQUIPMENT DESCRIPTION:**

ONE (1) GENERAL ELECTRIC MODEL MS-7000-1-B GAS TURBINE ENGINE (SERIAL # 281905) SERVING A 49.5 MW ELECTRICAL GENERATOR (UNIT #2)

## **PERMIT UNIT REQUIREMENTS**

- 1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
- 2. All equipment shall be maintained in proper operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201 and 2410] Federally Enforceable Through Title V Permit
- 3. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve the gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The gas turbine engine and generator lube oil vents shall be equipped with mist eliminators or equivalent technology sufficient to limit the visible emissions from the lube oil vents to not exceed 5% opacity, except for a period not exceeding three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Natural gas or 15 ppmw sulfur diesel are the only fuels permitted for combustion in the turbine. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. This unit shall be fired on natural gas as defined in 40 CFR 60.331(u) which has a total sulfur content of less than or equal to 1.0 gr/100 scf. [40 CFR 60.33(b), District Rule 4201, and Stanislaus Country Rule 407] Federally Enforceable Through Title V Permit
- 7. Fuel consumption shall be limited to 794.6 MMBtu per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The duration of all start-up and shutdown events shall not exceed 200 hours per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. The heat input to units N-2052-1 and N-2052-2 combined shall be limited to a total of 4,000,000 MMBtu/year when firing on natural gas and diesel during base load operation. The heat input to units N-2052-1 and N-2052-2 combined shall be limited to 2,000,000 MMBtu/year when firing on diesel during base load operation. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Except during start-up and shutdown periods, emissions from this unit shall not exceed any of the following limits when fired on natural gas: NOx (as NO2) 8.64 lb/hr and 3.0 ppmvd @ 15% O2; VOC (as CH4) 2.01 lb/hr and 2.0 ppmvd @ 15% O2; CO 26.29 lb/hr and 15.0 ppmvd @ 15% O2; PM10 7.5 lb/hr; or SOx 2.26 lb/hr. All emission concentration limits are based on 3-hour rolling averages. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit
- 11. Except during start-up and shutdown periods, emissions from this unit shall not exceed any of the following limits when fired on 15 ppmw sulfur diesel: NOx (as NO2) 15.31 lb/hr and 5.0 ppmvd @ 15% O2; VOC (as CH4) 2.14 lb/hr and 2.0 ppmvd @ 15% O2; CO 27.97 lb/hr and 15.0 ppmvd @ 15% O2; PM10 20.00 lb/hr; or SOx 1.19 lb/hr. All emission concentration limits are based on 3-hour rolling averages. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit

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

Facility Name: MODESTO IRRIGATION DISTRICT Location: MCCLURE,MODESTO, CA 95352 N-2052-2-11: Jun 30 2018 B-12AM - DAVIDSOS

- 12. Except during start-up and shutdown periods, NOx emissions from this unit shall not exceed the heat input weighted average of the applicable ppmvd or hourly limits when fired simultaneously on natural gas and 15 ppmw sulfur diesel, as calculated by the following equation: Weighted Average Limit = [(NOx limit for gaseous fuel x heat input from gaseous fuel) + (NOx limit for liquid fuel x heat input for liquid fuel)]/(heat input for gaseous fuel + heat input from liquid fuel). All emission concentration limits are based on 3-hour rolling averages. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. The emissions during start-up and shutdown periods shall not exceed 40 lb NOx (as NO2)/hr and 100 lb CO/hr when firing on natural gas or diesel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Start-up period is defined as the period of time during which the unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. The start-up period shall not exceed two hours for each start-up. [District Rule 4703, 3.24] Federally Enforceable Through Title V Permit
- 15. Shutdown is defined as the period beginning with the initiation of the turbine shutdown sequence and ending with the cessation of the firing of the turbine. The shutdown period shall not exceed two hours for each shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
- 16. The ammonia emissions shall not exceed either of the following limits: 11.4 lb/hr or 10.0 ppmvd @ 15% O2 based on a 24-hour rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: (ppmvd @ 15% O2) = (1,000,000 x a/b c) x d, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NOx concentration ppmvd @ 15% O2 across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; 2.) utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O2. If this option is chosen, the permittee shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation; 3.) Alternatively, the permittee may utilize a continuous in-stack ammonia monitor to verify compliance with the ammonia emissions limit. If this option is chosen, the permittee shall submit a monitoring plan for District approval at least 60 days prior to commencement of operation. [District Rule 4102] Federally Enforceable Through Title V Permit
- Emission rates shall not exceed any of the following limits: NOx (as NO2) 441.5 lb/day; VOC 51.4 lb/day; CO 887.4 lb/day; PM10 480.0 lb/day; or SOx (as SO2) 54.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Emissions from units N-2052-1 and N-2052-2 combined shall not exceed any of the following limits: NOx (as NO2) 76,282 lb/year; VOC 11,302 lb/year, CO 176,572 lb/year, PM10 77,218 lb/year; or SOx 12,281 lb/year. All annual emission limits are based on twelve consecutive month rolling emissions totals. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Each 3-hour rolling average will be compiled from the three most recent one hour periods. Each 1-hour period shall commence on the hour. Each 1-hour period in a 24-hour average for ammonia slip will commence on the hour. The 24-hour average will be calculated starting and ending at twelve-midnight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Daily emissions will be compiled for a 24-hour period starting and ending at twelve-midnight. Each calendar month in a twelve consecutive month rolling emissions total will commence at the beginning of the first day of the month. The twelve consecutive month rolling emissions totals to determine compliance with annual emission limits will be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Source testing to measure NOx, CO, VOC, PM10 and ammonia emissions shall be conducted at least once every twelve months. NOx, CO, VOC and ammonia emissions shall be reported in ppmvd @ 15% O2 and lb/hr, and PM10 emissions shall be reported in lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

- 23. Source testing to measure the start-up NOx emission rate shall be conducted at least once every seven years. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] Federally Enforceable Through Title V Permit
- 25. Emission concentrations shall be measured using the following test methods: EPA Methods 7E or 20 for NOx emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. [District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3] Federally Enforceable Through Title V Permit
- 26. VOC emissions (referenced as methane) shall be determined using EPA method 18 or EPA method 25. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 27. PM10 emissions shall be determined using EPA methods 201 and 202, EPA methods 201A and 202, EPA Method 5 or CARB Method 5 (total particulates). [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 28. Ammonia emissions shall be determined using BAAQMD method ST-1B. [District Rules 1081 and 4102] Federally Enforceable Through Title V Permit
- 29. The higher heating value and lower heating value of distillate fuels shall be determined using ASTM D240-87 or ASTM D2382-88. [District Rule 4703] Federally Enforceable Through Title V Permit
- The higher heating value and lower heating value of gaseous fuels shall be determined using ASTM D3588-91, ASTM 1826-88, or ASTM 1945-81. [District Rule 4703] Federally Enforceable Through Title V Permit
- 31. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
- 32. The District must be notified 30 days prior to any source testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
- 33. Source testing shall be witnessed or authorized by District personnel. Test results must be submitted to the District within 60 days of source testing. [District Rule 1081, 7.2 & 7.3] Federally Enforceable Through Title V Permit
- 34. EPA approved alternative source testing methods will be allowed, upon District approval, provided it does not result in a relaxation of emission limitations. The request to utilize EPA approved alternative source testing methods must be submitted in writing and written approval received from the District prior to the submission of the source test plan. [District Rules 1081 and 4001] Federally Enforceable Through Title V Permit
- 35. If the turbine is fired on noncertified diesel fuel, then the sulfur content of the liquid fuel being fired in the unit shall be determined using ASTM D 129-00, D 2622-98, D 4294-02, D 1266-98, D 5453-00 or D 1552-01. [District Rule 2520, 9.3.2 and 40 CFR 60.335(10)(i)] Federally Enforceable Through Title V Permit
- 36. If the turbine is not fired on certified 15 ppmw sulfur diesel fuel, the sulfur content shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(h)(4)] Federally Enforceable Through Title V Permit
- 37. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the 15 ppmw sulfur content diesel fuel requirement shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 38. The sulfur content of natural gas shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six months. If any six month monitoring show an exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3) and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

- 39. The owner or operator shall certify, maintain, operate, and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO, and O2 concentrations. The CEM shall be capable of monitoring emissions during startups and shutdowns as well as during normal operating conditions. [40 CFR 60.334 (b) and District Rules 4703, 6.2.1, 2201, & 1080] Federally Enforceable Through Title V Permit
- 40. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(2) and District Rule 1080, 6.4] Federally Enforceable Through Title V Permit
- 41. The NOx, CO, and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4A or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rules 1080 and 4703] Federally Enforceable Through Title V Permit
- 42. The CEMS shall be linked to a data logger which is compatible with the District's Data acquisition system and shall make CEM Data available to the District's automated polling system on a daily basis. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 43. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 44. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emission measurements. [40 CFR 60.7(b) and District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
- 45. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The reports is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [40 CFR 60.334(j), (j)(5), 60.7(c), 60.7(d), and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
- 46. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit
- 47. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 48. Results of the CEMS shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1 & 6.4] Federally Enforceable Through Title V Permit
- 49. In accordance with 40 CFR, Part 60, Appendix F, 5.1, cylinder gas audits (CGA) or relative accuracy audits (RAA) of continuous emission monitors shall be conducted quarterly, except during quarters in which a relative accuracy test audit (RATA) is performed. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit

- 50. The owner/operator shall perform a RATA as specified by 40 CFR Part 60, Appendix F, 5.11, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 51. The permittee shall monitor and record the fuel flow rate, NOx emission rate, CO emission rate, ammonia injection rate, exhaust temperature both prior to and after the SCR system, exhaust oxygen content and exhaust flow rate. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit
- 52. Owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, total hours of operation, type and quantity of fuel used. [District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
- 53. The permittee shall maintain the following records: date and time, duration, and type of any start-up, shutdown, or malfunction; source testing, evaluations, calibrations, checks, adjustments, any period which a continuous monitoring system or device was inoperative, and maintenance of any continuous emission monitoring system or device. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. The facility's operating and alarm logs must be available at the time of inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Owner or operator shall keep the following records: (1) A record of the 12-month rolling combined NOx, VOC, CO, PM10, and SOx emissions for units N-2052-1 and N-2052-2, in (lb/year). This record shall be updated on at least a monthly basis, (2) A record of the total combined annual heat input for units N-2052-1 and N-2052-2. This record shall be updated on at least a monthly basis, (3) A record of the combined annual heat input for units N-2052-1 and N-2052-2, when firing on diesel fuel. This record shall be updated on at least a monthly basis, and (4) A record of the annual total duration of all start-up and shutdown events for this turbine. [District Rule 2520] Federally Enforceable Through Title V Permit
- 56. All records required to be maintained by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 4703] Federally Enforceable Through Title V Permit
- 57. The requirements of the Acid Rain Program do not apply to this source because this is a simple combustion turbine that commenced commercial operation before November 15, 1990. A permit shield is granted from this requirement.

  [40 CFR 72.6(b)(1) and District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 58. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 407 (Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 59. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332 (a)(1), (h)(3), (j), (j)(1)(iii), and (j)(5). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 60. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8, 60.13, and District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 6.6, 7.1, 7.2, 7.3, 8.0, and 11.0; 1081(as amended 12/16/93), Sections 3.0, 6.0, 7.1, 7.2, and 7.3; and 4201 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

# **ATTACHMENT B**

Previous Title V Operating Permit

FACILITY: N-2052-0-2 EXPIRATION DATE: 09/30/2015

## **FACILITY-WIDE REQUIREMENTS**

- 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, Stanislaus County Rule 110, and Federal NSR/PSD Permit SJ 79-16] Federally Enforceable Through Title V Permit
- 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, Stanislaus County Rule 110, and Federal NSR/PSD Permit SJ 79-16] Federally Enforceable Through Title V Permit
- 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
- 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
- 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
- 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. In the event of changes in control or ownership, Federal NSR/PSD Permit SJ 79-16 shall be binding on new owners and operators. The applicant shall notify successor of the existence of Federal NSR/PSD Permit SJ 79-16 and its conditions in writing and forward a copy to the District, California Air Resources Board, and EPA. [District Rule 2031 and Federal NSR/PSD Permit SJ 79-16] Federally Enforceable Through Title V Permit
- 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
- 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
- 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 and Federal NSR/PSD Permit SJ 79-16] 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 and Federal NSR/PSD Permit SJ 79-16] 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 and Federal NSR/PSD Permit SJ 79-16] 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 and Federal NSR/PSD Permit SJ 79-16] 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 and Federal NSR/PSD Permit SJ 79-16] Federally Enforceable Through Title V Permit

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

- 22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). 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. 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. 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. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
- 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 Rules 8031 and 8011] Federally Enforceable Through Title V Permit
- 31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
- 32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
- 33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and Rule 8011] Federally Enforceable Through Title V Permit

- 34. 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 Rules 8071 and Rule 8011] Federally Enforceable Through Title V Permit
- 35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
- 36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Stanislaus County Rules 110, 202, and 401. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 42. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
- 43. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin April 30 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
- 44. All correspondence as required by a permit condition based on Federal NSR/PSD Permit SJ 79-16 shall be forwarded to: the District; Director, Air & Toxics Div. (Attn: A-3), EPA Region IX, 75 Hawthorne St. San Francisco, CA 94105; and Chief, Stationary Source Div., CARB, P.O. Box 2815, Sacramento, CA 95812. [Federal NSR/PSD Permit SJ 79-16] Federally Enforceable Through Title V Permit
- 45. Compliance with permit conditions in the Title V permit shall be deemed in compliance with Federal NSR/PSD Permit SJ 79-16. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

**PERMIT UNIT: N-2052-1-6** 

EXPIRATION DATE: 09/30/2015

#### **EQUIPMENT DESCRIPTION:**

ONE (1) GENERAL ELECTRIC MODEL MS-7000-1-B GAS TURBINE ENGINE (SERIAL # 281786) SERVING A 49.5 MW ELECTRICAL GENERATOR (UNIT #1)

## **PERMIT UNIT REQUIREMENTS**

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
- All equipment shall be maintained in proper operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201 and PSD Permit NSR 4-4-8, SJ 79-16] Federally Enforceable Through Title V Permit
- 3. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve the gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The gas turbine engine and generator lube oil vents shall be equipped with mist eliminators or equivalent technology sufficient to limit the visible emissions from the lube oil vents to not exceed 5% opacity, except for a period not exceeding three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- Natural gas or 15 ppmw sulfur diesel are the only fuels permitted for combustion in the turbine. [District Rule 2201]
   Federally Enforceable Through Title V Permit
- 6. This unit shall be fired on natural gas as defined in 40 CFR 60.331(u) which has a total sulfur content of less than or equal to 1.0 gr/100 scf. [40 CFR 60.33(b), District Rule 4201, and Stanislaus Country Rule 407] Federally Enforceable Through Title V Permit
- Fuel consumption shall be limited to 794.6 MMBtu per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The duration of all start-up and shutdown events shall not exceed 200 hours per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. The heat input to units N-2052-1 and N-2052-2 combined shall be limited to a total of 4,000,000 MMBtu/year when firing on natural gas and diesel during base load operation. The heat input to units N-2052-1 and N-2052-2 combined shall be limited to 2,000,000 MMBtu/year when firing on diesel during base load operation. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Except during start-up and shutdown periods, emissions from this unit shall not exceed any of the following limits when fired on natural gas: NOx (as NO2) 8.64 lb/hr and 3.0 ppmvd @ 15% O2; VOC (as CH4) 2.01 lb/hr and 2.0 ppmvd @ 15% O2; CO 26.29 lb/hr and 15.0 ppmvd @ 15% O2; PM10 7.5 lb/hr; or SOx 2.26 lb/hr. All emission concentration limits are based on 3-hour rolling averages. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit
- 11. Except during start-up and shutdown periods, emissions from this unit shall not exceed any of the following limits when fired on 15 ppmw sulfur diesel: NOx (as NO2) 15.31 lb/hr and 5.0 ppmvd @ 15% O2; VOC (as CH4) 2.14 lb/hr and 2.0 ppmvd @ 15% O2; CO 27.97 lb/hr and 15.0 ppmvd @ 15% O2; PM10 20.00 lb/hr; or SOx 1.19 lb/hr. All emission concentration limits are based on 3-hour rolling averages. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit

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

Facility Name: MODESTO IRRIGATION DISTRICT Location: MCCLURE,MODESTO, CA 95352 N-2052-1-5: Apr 8 2016 12:08PM - DAYGOSOS

- 12. Except during start-up and shutdown periods, NOx emissions from this unit shall not exceed the heat input weighted average of the applicable ppmvd or hourly limits when fired simultaneously on natural gas and 15 ppmw sulfur diesel, as calculated by the following equation: Weighted Average Limit = [(NOx limit for gaseous fuel x heat input from gaseous fuel) + (NOx limit for liquid fuel x heat input for liquid fuel)]/(heat input for gaseous fuel + heat input from liquid fuel). All emission concentration limits are based on 3-hour rolling averages. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. The emissions during start-up and shutdown periods shall not exceed 40 lb NOx (as NO2)/hr and 100 lb CO/hr when firing on natural gas or diesel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Start-up period is defined as the period of time during which the unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. The start-up period shall not exceed two hours for each start-up. [District Rule 4703, 3.24] Federally Enforceable Through Title V Permit
- 15. Shutdown is defined as the period beginning with the initiation of the turbine shutdown sequence and ending with the cessation of the firing of the turbine. The shutdown period shall not exceed two hours for each shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
- 16. The ammonia emissions shall not exceed either of the following limits: 11.4 lb/hr or 10.0 ppmvd @ 15% O2 based on a 24-hour rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: (ppmvd @ 15% O2) = (1,000,000 x a/b c) x d, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NOx concentration ppmvd @ 15% O2 across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; 2.) utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O2. If this option is chosen, the permittee shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation; 3.) Alternatively, the permittee may utilize a continuous in-stack ammonia monitor to verify compliance with the ammonia emissions limit. If this option is chosen, the permittee shall submit a monitoring plan for District approval at least 60 days prior to commencement of operation. [District Rule 4102] Federally Enforceable Through Title V Permit
- Emission rates shall not exceed any of the following limits: NOx (as NO2) 441.5 lb/day; VOC 51.4 lb/day; CO 887.4 lb/day; PM10 480.0 lb/day; or SOx (as SO2) 54.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Emissions from units N-2052-1 and N-2052-2 combined shall not exceed any of the following limits: NOx (as NO2) 76,282 lb/year; VOC 11,302 lb/year, CO 176,572 lb/year, PM10 77,218 lb/year; or SOx 12,281 lb/year. All annual emission limits are based on twelve consecutive month rolling emissions totals. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Each 3-hour rolling average will be compiled from the three most recent one hour periods. Each 1-hour period shall commence on the hour. Each 1-hour period in a 24-hour average for ammonia slip will commence on the hour. The 24-hour average will be calculated starting and ending at twelve-midnight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Daily emissions will be compiled for a 24-hour period starting and ending at twelve-midnight. Each calendar month in a twelve consecutive month rolling emissions total will commence at the beginning of the first day of the month. The twelve consecutive month rolling emissions totals to determine compliance with annual emission limits will be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Source testing to measure NOx, CO, VOC, PM10 and ammonia emissions shall be conducted at least once every twelve months. NOx, CO, VOC and ammonia emissions shall be reported in ppmvd @ 15% O2 and lb/hr, and PM10 emissions shall be reported in lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

- Source testing to measure the start-up NOx emission rate shall be conducted at least once every seven years. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] Federally Enforceable Through Title V Permit
- 25. Emission concentrations shall be measured using the following test methods: EPA Methods 7E or 20 for NOx emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. The 9-run tests shall be performed at highest physically achievable load of the gas turbine. [40 CFR 60.335(a), (b)(7), and District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3] Federally Enforceable Through Title V Permit
- 26. VOC emissions (referenced as methane) shall be determined using EPA method 18 or EPA method 25. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 27. PM10 emissions shall be determined using EPA methods 201 and 202, EPA methods 201A and 202, EPA Method 5 or CARB Method 5 (total particulates). [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 28. Ammonia emissions shall be determined using BAAQMD method ST-1B. [District Rules 1081 and 4102] Federally Enforceable Through Title V Permit
- 29. The higher heating value and lower heating value of distillate fuels shall be determined using ASTM D240-87 or ASTM D2382-88. [District Rule 4703] Federally Enforceable Through Title V Permit
- The higher heating value and lower heating value of gaseous fuels shall be determined using ASTM D3588-91, ASTM 1826-88, or ASTM 1945-81. [District Rule 4703] Federally Enforceable Through Title V Permit
- 31. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
- 32. The District must be notified 30 days prior to any source testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
- 33. Source testing shall be witnessed or authorized by District personnel. Test results must be submitted to the District within 60 days of source testing. [District Rule 1081, 7.2 & 7.3] Federally Enforceable Through Title V Permit
- 34. EPA approved alternative source testing methods will be allowed, upon District approval, provided it does not result in a relaxation of emission limitations. The request to utilize EPA approved alternative source testing methods must be submitted in writing and written approval received from the District prior to the submission of the source test plan. [District Rules 1081 and 4001] Federally Enforceable Through Title V Permit
- 35. If the turbine is fired on noncertified diesel fuel, then the sulfur content of the liquid fuel being fired in the unit shall be determined using ASTM D 129-00, D 2622-98, D 4294-02, D 1266-98, D 5453-00 or D 1552-01. [District Rule 2520, 9.3.2 and 40 CFR 60.335(10)(i)] Federally Enforceable Through Title V Permit
- 36. If the turbine is not fired on certified 15 ppmw sulfur diesel fuel, the sulfur content shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(h)(4)] Federally Enforceable Through Title V Permit
- 37. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the 15 ppmw sulfur content diesel fuel requirement shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 38. The sulfur content of natural gas shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six months. If any six month monitoring show an exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3) and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 39. The owner or operator shall certify, maintain, operate, and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO, and O2 concentrations. The CEM shall be capable of monitoring emissions during startups and shutdowns as well as during normal operating conditions. [40 CFR 60.334 (b) and District Rules 4703, 6.2.1, 2201, & 1080] Federally Enforceable Through Title V Permit
- 40. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(2) and District Rule 1080, 6.4] Federally Enforceable Through Title V Permit
- 41. The NOx, CO, and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2 and 3, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(1) and District Rule 1080, 6.3, 6.5, 6.6, & 7.2] Federally Enforceable Through Title V Permit
- 42. The CEMS shall be linked to a data logger which is compatible with the District's Data acquisition system and shall make CEM Data available to the District's automated polling system on a daily basis. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 43. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 44. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emission measurements. [40 CFR 60.7(b) and District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
- 45. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The reports is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [40 CFR 60.334(j), (j)(5), 60.7(c), 60.7(d), and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
- 46. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit
- 47. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 48. Results of the CEMS shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1 & 6.4] Federally Enforceable Through Title V Permit

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

Facility Name: MODESTO IRRIGATION DISTRICT Location: MCCLURE, MODESTO, CA 95352 N-2052-1-6: Apr 6 2016 1206PM - DAVIDSOS

- 49. In accordance with 40 CFR, Part 60, Appendix F, 5.1, cylinder gas audits (CGA) or relative accuracy audits (RAA) of continuous emission monitors shall be conducted quarterly, except during quarters in which a relative accuracy test audit (RATA) is performed. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 50. The owner/operator shall perform a RATA as specified by 40 CFR Part 60, Appendix F, 5.11, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 51. The permittee shall monitor and record the fuel flow rate, NOx emission rate, CO emission rate, ammonia injection rate, exhaust temperature both prior to and after the SCR system, exhaust oxygen content and exhaust flow rate. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit
- 52. Owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, total hours of operation, type and quantity of fuel used. [District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
- 53. The permittee shall maintain the following records: date and time, duration, and type of any start-up, shutdown, or malfunction; source testing, evaluations, calibrations, checks, adjustments, any period which a continuous monitoring system or device was inoperative, and maintenance of any continuous emission monitoring system or device. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. The facility's operating and alarm logs must be available at the time of inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Owner or operator shall keep the following records: (1) A record of the 12-month rolling combined NOx, VOC, CO, PM10, and SOx emissions for units N-2052-1 and N-2052-2, in (lb/year). This record shall be updated on at least a monthly basis, (2) A record of the total combined annual heat input for units N-2052-1 and N-2052-2. This record shall be updated on at least a monthly basis, (3) A record of the combined annual heat input for units N-2052-1 and N-2052-2, when firing on diesel fuel. This record shall be updated on at least a monthly basis, and (4) A record of the annual total duration of all start-up and shutdown events for this turbine. [District Rule 2520] Federally Enforceable Through Title V Permit
- 56. All records required to be maintained by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 4703] Federally Enforceable Through Title V Permit
- 57. The requirements of the Acid Rain Program do not apply to this source because this is a simple combustion turbine that commenced commercial operation before November 15, 1990. A permit shield is granted from this requirement. [40 CFR 72.6(b)(1) and District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 58. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 407 (Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 59. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332 (a)(1), (h)(3), (j), (j)(1)(iii), and (j)(5). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 60. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8, 60.13, and District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 6.6, 7.1, 7.2, 7.3, 8.0, and 11.0; 1081(as amended 12/16/93), Sections 3.0, 6.0, 7.1, 7.2, and 7.3; and 4201 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** N-2052-2-7

EXPIRATION DATE: 09/30/2015

#### **EQUIPMENT DESCRIPTION:**

ONE (1) GENERAL ELECTRIC MODEL MS-7000-1-B GAS TURBINE ENGINE (SERIAL # 281905) SERVING A 49.5 MW ELECTRICAL GENERATOR (UNIT #2)

### PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
- 2. All equipment shall be maintained in proper operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201 and PSD Permit NSR 4-4-8, SJ 79-16] Federally Enforceable Through Title V Permit
- A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve the gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The gas turbine engine and generator lube oil vents shall be equipped with mist eliminators or equivalent technology sufficient to limit the visible emissions from the lube oil vents to not exceed 5% opacity, except for a period not exceeding three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- Natural gas or 15 ppmw sulfur diesel are the only fuels permitted for combustion in the turbine. [District Rule 2201]
   Federally Enforceable Through Title V Permit
- 6. This unit shall be fired on natural gas as defined in 40 CFR 60.331(u) which has a total sulfur content of less than or equal to 1.0 gr/100 scf. [40 CFR 60.33(b), District Rule 4201, and Stanislaus Country Rule 407] Federally Enforceable Through Title V Permit
- Fuel consumption shall be limited to 794.6 MMBtu per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The duration of all start-up and shutdown events shall not exceed 200 hours per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. The heat input to units N-2052-1 and N-2052-2 combined shall be limited to a total of 4,000,000 MMBtu/year when firing on natural gas and diesel during base load operation. The heat input to units N-2052-1 and N-2052-2 combined shall be limited to 2,000,000 MMBtu/year when firing on diesel during base load operation. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Except during start-up and shutdown periods, emissions from this unit shall not exceed any of the following limits when fired on natural gas: NOx (as NO2) 8.64 lb/hr and 3.0 ppmvd @ 15% O2; VOC (as CH4) 2.01 lb/hr and 2.0 ppmvd @ 15% O2; CO 26.29 lb/hr and 15.0 ppmvd @ 15% O2; PM10 7.5 lb/hr; or SOx 2.26 lb/hr. All emission concentration limits are based on 3-hour rolling averages. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit
- 11. Except during start-up and shutdown periods, emissions from this unit shall not exceed any of the following limits when fired on 15 ppmw sulfur diesel: NOx (as NO2) 15.31 lb/hr and 5.0 ppmvd @ 15% O2; VOC (as CH4) 2.14 lb/hr and 2.0 ppmvd @ 15% O2; CO 27.97 lb/hr and 15.0 ppmvd @ 15% O2; PM10 20.00 lb/hr; or SOx 1.19 lb/hr. All emission concentration limits are based on 3-hour rolling averages. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit

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

Facility Name: MODESTO IRRIGATION DISTRICT Location: MCCLURE,MODESTO, CA 95352 N-2052-2-7: Apr 6 2016 12:08PM ~ DAVIDSOS

- 12. Except during start-up and shutdown periods, NOx emissions from this unit shall not exceed the heat input weighted average of the applicable ppmvd or hourly limits when fired simultaneously on natural gas and 15 ppmw sulfur diesel, as calculated by the following equation: Weighted Average Limit = [(NOx limit for gaseous fuel x heat input from gaseous fuel) + (NOx limit for liquid fuel x heat input for liquid fuel)]/(heat input for gaseous fuel + heat input from liquid fuel). All emission concentration limits are based on 3-hour rolling averages. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. The emissions during start-up and shutdown periods shall not exceed 40 lb NOx (as NO2)/hr and 100 lb CO/hr when firing on natural gas or diesel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Start-up period is defined as the period of time during which the unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. The start-up period shall not exceed two hours for each start-up. [District Rule 4703, 3.24] Federally Enforceable Through Title V Permit
- 15. Shutdown is defined as the period beginning with the initiation of the turbine shutdown sequence and ending with the cessation of the firing of the turbine. The shutdown period shall not exceed two hours for each shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
- 16. The ammonia emissions shall not exceed either of the following limits: 11.4 lb/hr or 10.0 ppmvd @ 15% O2 based on a 24-hour rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: (ppmvd @ 15% O2) = (1,000,000 x a/b c) x d, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NOx concentration ppmvd @ 15% O2 across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; 2.) utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O2. If this option is chosen, the permittee shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation; 3.) Alternatively, the permittee may utilize a continuous in-stack ammonia monitor to verify compliance with the ammonia emissions limit. If this option is chosen, the permittee shall submit a monitoring plan for District approval at least 60 days prior to commencement of operation. [District Rule 4102] Federally Enforceable Through Title V Permit
- Emission rates shall not exceed any of the following limits: NOx (as NO2) 441.5 lb/day; VOC 51.4 lb/day; CO 887.4 lb/day; PM10 480.0 lb/day; or SOx (as SO2) 54.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Emissions from units N-2052-1 and N-2052-2 combined shall not exceed any of the following limits: NOx (as NO2) 76,282 lb/year; VOC 11,302 lb/year, CO 176,572 lb/year, PM10 77,218 lb/year; or SOx 12,281 lb/year. All annual emission limits are based on twelve consecutive month rolling emissions totals. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Each 3-hour rolling average will be compiled from the three most recent one hour periods. Each 1-hour period shall commence on the hour. Each 1-hour period in a 24-hour average for ammonia slip will commence on the hour. The 24-hour average will be calculated starting and ending at twelve-midnight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Daily emissions will be compiled for a 24-hour period starting and ending at twelve-midnight. Each calendar month in a twelve consecutive month rolling emissions total will commence at the beginning of the first day of the month. The twelve consecutive month rolling emissions totals to determine compliance with annual emission limits will be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Source testing to measure NOx, CO, VOC, PM10 and ammonia emissions shall be conducted at least once every twelve months. NOx, CO, VOC and ammonia emissions shall be reported in ppmvd @ 15% O2 and lb/hr, and PM10 emissions shall be reported in lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

- 23. Source testing to measure the start-up NOx emission rate shall be conducted at least once every seven years. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] Federally Enforceable Through Title V Permit
- 25. Emission concentrations shall be measured using the following test methods: EPA Methods 7E or 20 for NOx emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. The 9-run tests shall be performed at highest physically achievable load of the gas turbine. [40 CFR 60.335(a), (b)(7), and District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3] Federally Enforceable Through Title V Permit
- 26. VOC emissions (referenced as methane) shall be determined using EPA method 18 or EPA method 25. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 27. PM10 emissions shall be determined using EPA methods 201 and 202, EPA methods 201A and 202, EPA Method 5 or CARB Method 5 (total particulates). [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 28. Ammonia emissions shall be determined using BAAQMD method ST-1B. [District Rules 1081 and 4102] Federally Enforceable Through Title V Permit
- 29. The higher heating value and lower heating value of distillate fuels shall be determined using ASTM D240-87 or ASTM D2382-88. [District Rule 4703] Federally Enforceable Through Title V Permit
- The higher heating value and lower heating value of gaseous fuels shall be determined using ASTM D3588-91, ASTM 1826-88, or ASTM 1945-81. [District Rule 4703] Federally Enforceable Through Title V Permit
- 31. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
- 32. The District must be notified 30 days prior to any source testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
- 33. Source testing shall be witnessed or authorized by District personnel. Test results must be submitted to the District within 60 days of source testing. [District Rule 1081, 7.2 & 7.3] Federally Enforceable Through Title V Permit
- 34. EPA approved alternative source testing methods will be allowed, upon District approval, provided it does not result in a relaxation of emission limitations. The request to utilize EPA approved alternative source testing methods must be submitted in writing and written approval received from the District prior to the submission of the source test plan. [District Rules 1081 and 4001] Federally Enforceable Through Title V Permit
- 35. If the turbine is fired on noncertified diesel fuel, then the sulfur content of the liquid fuel being fired in the unit shall be determined using ASTM D 129-00, D 2622-98, D 4294-02, D 1266-98, D 5453-00 or D 1552-01. [District Rule 2520, 9.3.2 and 40 CFR 60.335(10)(i)] Federally Enforceable Through Title V Permit
- 36. If the turbine is not fired on certified 15 ppmw sulfur diesel fuel, the sulfur content shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(h)(4)] Federally Enforceable Through Title V Permit
- 37. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the 15 ppmw sulfur content diesel fuel requirement shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 38. The sulfur content of natural gas shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six months. If any six month monitoring show an exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3) and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 39. The owner or operator shall certify, maintain, operate, and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO, and O2 concentrations. The CEM shall be capable of monitoring emissions during startups and shutdowns as well as during normal operating conditions. [40 CFR 60.334 (b) and District Rules 4703, 6.2.1, 2201, & 1080] Federally Enforceable Through Title V Permit
- 40. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(2) and District Rule 1080, 6.4] Federally Enforceable Through Title V Permit
- 41. The NOx, CO, and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2 and 3, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(1) and District Rule 1080, 6.3, 6.5, 6.6, & 7.2] Federally Enforceable Through Title V Permit
- 42. The CEMS shall be linked to a data logger which is compatible with the District's Data acquisition system and shall make CEM Data available to the District's automated polling system on a daily basis. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a Districtapproved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 43. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 44. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emission measurements. [40 CFR 60.7(b) and District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
- 45. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The reports is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [40 CFR 60.334(j), (j)(5), 60.7(c), 60.7(d), and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
- 46. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit
- 47. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 48. Results of the CEMS shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1 & 6.4] Federally Enforceable Through Title V Permit

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

Facility Name: MODESTO IRRIGATION DISTRICT Location: MCCLURE, MODESTO, CA 95352 N-2052-2-7: Apr 6 2016 12:06PM - DAY/DSOS

- 49. In accordance with 40 CFR, Part 60, Appendix F, 5.1, cylinder gas audits (CGA) or relative accuracy audits (RAA) of continuous emission monitors shall be conducted quarterly, except during quarters in which a relative accuracy test audit (RATA) is performed. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 50. The owner/operator shall perform a RATA as specified by 40 CFR Part 60, Appendix F, 5.11, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 51. The permittee shall monitor and record the fuel flow rate, NOx emission rate, CO emission rate, ammonia injection rate, exhaust temperature both prior to and after the SCR system, exhaust oxygen content and exhaust flow rate. [District Rules 2201, 4001 and 4703] Federally Enforceable Through Title V Permit
- 52. Owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, total hours of operation, type and quantity of fuel used. [District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit.
- 53. The permittee shall maintain the following records: date and time, duration, and type of any start-up, shutdown, or malfunction; source testing, evaluations, calibrations, checks, adjustments, any period which a continuous monitoring system or device was inoperative, and maintenance of any continuous emission monitoring system or device. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. The facility's operating and alarm logs must be available at the time of inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Owner or operator shall keep the following records: (1) A record of the 12-month rolling combined NOx, VOC, CO, PM10, and SOx emissions for units N-2052-1 and N-2052-2, in (lb/year). This record shall be updated on at least a monthly basis, (2) A record of the total combined annual heat input for units N-2052-1 and N-2052-2. This record shall be updated on at least a monthly basis, (3) A record of the combined annual heat input for units N-2052-1 and N-2052-2, when firing on diesel fuel. This record shall be updated on at least a monthly basis, and (4) A record of the annual total duration of all start-up and shutdown events for this turbine. [District Rule 2520] Federally Enforceable Through Title V Permit
- 56. All records required to be maintained by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 4703] Federally Enforceable Through Title V Permit
- 57. The requirements of the Acid Rain Program do not apply to this source because this is a simple combustion turbine that commenced commercial operation before November 15, 1990. A permit shield is granted from this requirement. [40 CFR 72.6(b)(1) and District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 58. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rule 407 (Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 59. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332 (a)(1), (h)(3), (j), (j)(1)(iii), and (j)(5). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 60. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8, 60.13, and District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 6.6, 7.1, 7.2, 7.3, 8.0, and 11.0; 1081(as amended 12/16/93), Sections 3.0, 6.0, 7.1, 7.2, and 7.3; and 4201 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

# ATTACHMENT C

**Detailed Facility List** 

Ö	5
꾸	$\leq$
南	C
ĩ	Q

# Detailed Facility Report For Facility=2052

4/6/16 12:08 pm

MODESTO IRRIGATION DISTRICT MCCLURE MODESTO, CA 98352 N-2052-2-7 N-2052-1-6 PERMIT NUMBER FEE DESCRIPTION 49,500 kW 49,500 kW 3020-08A G 3020-08A G FEE RULE Sorted by Facility Name and Permit Number
FAC# N.2052 9 FAC# STATUS TELEPHONE: 10,706.00 AMOUNT 10,706.00 A 2095267616 10,706.00 10,706.00 TOTAL FIE PERMIT STATUS > > ONE (1) GENERAL ELECTRIC MODEL MS-7000-1-8 GAS TURBINE ENGINE (SERIAL # 281905) SERVING A 49.5 MW ELECTRICAL GENERATOR (UNIT #2) ONE (1) GENERAL ELECTRIC MODEL MS-7000-1-B GAS TURBINE ENGINE (SERIAL # 281786) SERVING A 49.5 MW ELECTRICAL GENERATOR (UNIT #1) EQUIPMENT DESCRIPTION TYPE: 78801 Veltit EXPIRE ON: AREA: INSP. DATE: 09/30/2015 8 / 05/16

Number of Facilities Reported: 1

# ATTACHMENT D

Modesto Irrigation District Comments
And District Responses

On May 4, 2016, the District proposed to renew Modesto Irrigation District's Title V permit. On June 27, 2016, MID commented on the renewal requesting clarification, minor typographical errors, and administrative changes. After District reviewed the comments the District revised the evaluation, and made minor changes to the permits. Listed below are summarized comments and responses:

#### Comments:

- 1) MID requests a revising to Section IX, <u>Permit Shield</u>, of the evaluations. MID initially requested the use of model templates and requests to keep all permit shields remain in place.
- 2) MID requests that all reference to the Federal NSR/PSD Permit SJ 79-16 be removed from all facility permits.
- 3) MID requests condition 25 of N-2052-1-6 and '- 2-7 have the language and accompanying regulatory reference "The 9-run tests shall be performed at highest physically achievable load of the gas turbine," (40CFR60.335(b)(7)) be removed from the permit.
- 4) MID requests condition 41 of permits N-2052-1-6 and '-2-7 include 40CFR60 Appendix B, Performance Specification 4A.

#### Response:

- 1) The District changed the wording in the evaluation's Section IX to reflect the permit shields and to leave the shields on the permits to operate
- 2) The District will replace all references to Federal NSR/PSD Permit SJ 79-16 with District Rule 2410
- 3) The wording in condition 41, "The 9-run tests shall be performed at highest physically achievable load of the gas turbine," and the reference to 40CFR60.335(b)(7) is associated with initial start-up. The facility has passed all initial start up.
- 4) Performance Specification 4A is included in the Performance Specifications listed in condition 41along with the rule reference to District Rule 4703.

#### Steven Davidson

From:

Michael Miller < Michael. Miller@mid.org>

Sent:

Monday, June 27, 2016 3:52 PM

To:

Steven Davidson

Cc:

Richard Smith: Dan Welch: Jeff Adkins

Subject:

Facility N-2052 Comments to Notice of Preliminary Decision - Title V Permit Renewal

#### Hi Steven,

Here are Modesto Irrigation District's (MID) complete comments to the Notice of Preliminary Decision - Title V Permit Renewal for facility N-2052:

- 1) Section IX (page 10) Permit Shield. MID did request the use of model templates and requests to keep all permit shields in place. Not that Section IV (page 3) of the documents that "the applicant is requesting to use the following model template"....
- 2) MID requests that all reference to the Federal NSR/PSD Permit SJ 79-16 be removed from all conditions (Conditions 6, 7, 12, 18, 19, 20, 21, 44, and 45 of the facility wide permit and Condition 2 of both permits 1-6 and 2-7).
  - a. This permit has been subsumed in its entirety by other regulations and permits.
- 3) Condition 25 of both permits 1-6 and 2-7: MID requests to have the language and accompanying regulatory reference "The 9-run tests shall be performed at highest physically achievable load of the gas turbine," (40CFR60.335(b)(7)) be removed from the permit.
  - a. 40CFR60.335(b)(7) is a requirement for an initial certification test. The referenced tests were completed and are one time tests.
- 4) Condition 41 of both permits 1-6 and 2-7: MID requests that 40CFR60 Appendix B, Performance Specification 4a be included in with Performance Specifications 2 and 3.
  - a. Performance Specifications 2 and 3 do not address QC requirements for the required CO CEMS.

#### Sincerely,

Michael J. Miller, QSTI Environmental Compliance Specialist Power Generation

Office: (209) 526-7617

Address: 1240 Graphics Dr., Modesto, CA 95351

Michael Miller@MID.org

