



SEP 13 2016

Mr. Harold Ditmer  
Fresno Cogeneration Partners  
8105B S. Lassen Avenue  
San Joaquin, CA 93660

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-14  
Project # C-1150578**


Dear Mr. Ditmer:

The District has issued the Final Renewed Title V Permit for Fresno Cogeneration Partners (see enclosure). The preliminary decision for this project was made on June 29, 2016. A summary of the comments and the District's response to each comment is included as Attachment D to the revised engineering evaluation, which is also attached. This permit renewal review addresses all comments submitted by the EPA and CARB.

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 Marjollet  
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

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

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

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



Facility # C-14  
FRESNO COGENERATION PARTNERS  
8105-B S LASSEN AVE  
SAN JOAQUIN, CA 93660

## Notice of Permit Issuance

The enclosed permit unit requirements authorize the operation of the equipment as described. These permit unit requirements supersede any and all previous permits for the specified equipment.\* Please insert these documents into the Facility Permit to Operate, and post copies on or near the equipment as required by District Rule 2010.

Please contact any of our Small Business Assistance (SBA) staff at the numbers below if you have any questions:

Modesto: (209) 557-6446  
Fresno: (559) 230-5888  
Bakersfield: (661) 392-5665

\*Failure to comply with the permit unit requirements may result in enforcement action.

**Seyed Sadredin**

Executive Director/Air Pollution Control Officer

**Northern Region**

4800 Enterprise Way

Modesto, CA 95356-8718

Tel: (209) 557-6400 FAX: (209) 557-6475

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**Southern Region**

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Bakersfield, CA 93308-9725

Tel: 661-392-5500 FAX: 661-392-5585

# Permit to Operate

**FACILITY:** C-14

**EXPIRATION DATE:** 08/31/2020

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

FRESNO COGENERATION PARTNERS  
8105-B S LASSEN AVE  
SAN JOAQUIN, CA 93660

**FACILITY LOCATION:**

8105 S LASSEN AVE  
SAN JOAQUIN, CA 93660

**FACILITY DESCRIPTION:**

COGENERATION

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

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

Seyed Sadredin  
Executive Director / APCO

Arnaud Marjollet  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: C-14-0-4

EXPIRATION DATE: 08/31/2020

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (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. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: FRESNO COGENERATION PARTNERS  
Location: 8105 S LASSEN AVE, SAN JOAQUIN, CA 93660  
C-14-0-4 : Sep 8 2016 11:13AM - THAOSE

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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in 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
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) 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 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 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). 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. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin December 20 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-14-4-6

**EXPIRATION DATE:** 08/31/2020

**EQUIPMENT DESCRIPTION:**

136 BHP CUMMINS MODEL #V378F2 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIRE WATER PUMP

## PERMIT UNIT REQUIREMENTS

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1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed in concentration at the point of discharge 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the initial start-up hours, the number of hours of operation, and the purpose of the operation (for example, load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-14-5-6

**EXPIRATION DATE:** 08/31/2020

**EQUIPMENT DESCRIPTION:**

534 HP CATERPILLAR DIESEL IC ENGINE MODEL 3406B POWERING AN EMERGENCY ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed in concentration at the point of discharge 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. During periods of maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example, oil pressure, exhaust gas temperature, etc.). [District Rule 4702] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the initial start-up hours, the number of hours of operation, the purpose of the operation (for example, load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 2520 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-14-10-11

EXPIRATION DATE: 08/31/2020

## EQUIPMENT DESCRIPTION:

23 MW ELECTRICAL GENERATOR POWERED BY A PRATT AND WHITNEY MODEL FT4A9 GAS-FIRED, SIMPLE CYCLE TURBINE ENGINE WITH DRY LOW NOX (DLN) TECHNOLOGY OR WATER INJECTION, A SELECTIVE CATALYTIC REDUCTIONS (SCR) SYSTEM, AN OXIDATION CATALYST, AN INLET AIR EVAPORATIVE COOLER, AND LUBE OIL VENT MIST ELIMINATORS

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
2. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Gas turbine shall be equipped with a calibrated continuous monitoring system to measure and record hours of operation and fuel consumption. [District Rules 2201, 2520 9.4.2, and 4703 6.2.1] Federally Enforceable Through Title V Permit
5. The gas turbine engine and generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater except for up to three minutes in any hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heat input to the turbine shall not exceed 1,320,000 MMBtu/year based on a 12-month rolling sum. Compliance with this limit shall be determined at the end of each month. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Units subject to the Specific Limiting Condition (SLC) plan are C-14-10 and '-11. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Combined emission rate for all units subject to the SLC plan shall not exceed any of the following: 120.9 lb-PM10/day, 50.9 lb-SOx/day, 209.2 lb-NOx/day, 562.7 lb-CO/day, or 45.7 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The combined annual emissions rates for all units subject to the SLC plan shall not exceed either of the following: 48,539 lb-NOx/year or 199,889 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emissions rate, or Permit to Operate is surrendered or sold. [District Rule 2201] Federally Enforceable Through Title V Permit
11. For each unit subject to the SLC, the permittee shall maintain all necessary records in order to show compliance with the daily and annual SLC limits, including (but not limited to) the following: 1) amount of fuel used, 2) HHV of fuel, 3) calculated daily emissions for each air contaminant emitted, 4) daily emissions measured by CEMS, 5) and calculated combined annual emissions for NOx and CO. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. This unit shall be fired exclusively on PUC-quality natural gas and the PUC-quality natural gas shall have a total sulfur content of less than or equal to 1.0 gr/100 scf. [40 CFR 60.333(b) and District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
13. The fuel sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, or tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or GAS Processors Association Standard 2377. If the fuel sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the monitoring frequency shall be every 6 months. If any six-month monitoring tests result in a fuel sulfur content exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
14. Except during transitional operation period, emission rates from the gas turbine shall not exceed any of the following: PM10: 2.22 lb/hr, SOx (as SO2): 0.98 lb/hr, NOx (as NO2): 5.0 ppmvd @ 15% O2 and 6.20 lb/hr (based on a 3-hour average), VOC: 2.0 ppmvd @ 15% O2 and 0.88 lb/hr, CO: 12.0 ppmvd @ 15% O2 and 8.07 lb/hr (based on a 3-hour rolling average), or ammonia: 10 ppmvd @ 15% O2 (based on a 1-hour rolling average). [District Rules 2201, 4102, 4301, 4703 and 40 CFR Part 60 Subpart GG] Federally Enforceable Through Title V Permit
15. During transitional operation period, emission rates from the gas turbine shall not exceed any of the following: PM10: 2.22 lb/hr, SOx (as SO2): 0.98 lb/hr, NOx (as NO2): 20 lb/hr (based on a 3-hour rolling average), VOC: 0.88 lb/hr, CO: 8.07 lb/r (based on a 3-hour rolling average), or ammonia: 20 ppmvd @ 15% O2 (based on a 1-hour rolling average). [District Rules 2201, 4102, 4301, 4703 and 40 CFR Part 60 Subpart GG] Federally Enforceable Through Title V Permit
16. Transitional operation period shall be any of the following periods as they are define in Rule 4703: bypass transition period, primary re-ignition period, reduced load period start-up or shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
17. Permittee 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] Federally Enforceable Through Title V Permit
18. In the event of a breakdown of monitoring equipment, the owner shall notify the APCO as soon as reasonably possible, but no later than eight (8) hours after its detection, unless the owner or operator demonstrates to the APCO's satisfaction that a longer reporting period was necessary, and shall initiate repairs. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
19. A violation of emissions standards indicated by the CEM system shall be reported to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
20. 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] Federally Enforceable Through Title V Permit
21. Compliance with the ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 =  $((a-(b \times c/1,000,000)) \times 1,000,000/b)$ , where a = ammonia injection rate (lb/hr)/17 lb/lb.mol, b = dry exhaust gas flow rate (lb/hr)/29(lb/lb.mol), and c = change in measure NOx concentration ppmv @ 15% O2 across catalyst. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Compliance testing to measure the PM10, NOx (as NO2), VOC, CO, ammonia emissions, and fuel gas sulfur content of this permit unit shall be conducted at least once every twelve months. [District Rules 2201 and 4703, 6.3 and 40 CFR 60.332 (a), (b) and 40 CFR 60.333] Federally Enforceable Through Title V Permit
23. The following test methods shall be used. PM10: EPA Method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA Method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA Method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 4703, 6.4, and 40 CFR 60.335(b)] 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.

24. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.332(a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
25. Permittee shall comply with all applicable source sampling requirements of District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO<sub>x</sub>, CO, and O<sub>2</sub> analyzer during District inspections. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Compliance demonstration (source testing) shall be District witnessed, or authorized and the samples shall be collected by a California Air Resources Board certified testing laboratory. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days of source testing. [District Rule 1081] Federally Enforceable Through Title V Permit
28. The owner or operator shall install, certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO<sub>x</sub> (before and after the SCR catalyst), CO, and O<sub>2</sub> concentrations. The CEMS 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 1080, 2201, and 4703] Federally Enforceable Through Title V Permit
29. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.334(b)(2) and District Rule 1080] Federally Enforceable Through Title V Permit
30. Results of the CEM system shall be averaged over three hour periods using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NO<sub>x</sub>, EPA Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for O<sub>2</sub>, or all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703 5.1, 6.4] Federally Enforceable Through Title V Permit
31. The NO<sub>x</sub>, CO, and O<sub>2</sub> CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60 Appendix B Performance Specifications 2 and 3. [40 CFR 60.334(b)(1) and District Rule 1080] Federally Enforceable Through Title V Permit
32. 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, calibration, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements. [40 CFR 60.7(b) and District Rule 1080] Federally Enforceable Through Title V Permit
33. Audits of continuous emissions monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
34. The owner/operator shall perform a relative accuracy test (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
35. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. this summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

36. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventative measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period and used to determine compliance with an emissions 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) and District Rule 1080] Federally Enforceable Through Title V Permit
37. The owner or operator shall report periods of excess emissions that are defined as follows: any one-hour period during which the average-water-to-fuel ratio (when the CEMS is not operational and Dry-Low NOx technology is not being used), as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the NOx emission limit. Each report shall include average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. [40 CFR 60.334(c)(1)] Federally Enforceable Through Title V Permit
38. Results of the CEM system 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 California Air Resources Board, and the Environmental Protection Agency. [District Rule 1080, 6.0] Federally Enforceable Through Title V Permit
39. The continuous monitor of fuel, water, and water-to-fuel ratio system shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the NOx emissions limits at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. [40 CFR 60.335(b)(2)] Federally Enforceable Through Title V Permit
40. The minimum ammonia injection rate shall be reported to the District and the injection rate shall be monitored by the operator during CEM breakdowns to demonstrate NOx emission compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
41. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
42. The permittee shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rule 4703, 6.2.4 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
43. The permittee shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, and calculated NOx mass emission rates (lb/hr). [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
44. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-14-11-11

**EXPIRATION DATE:** 08/31/2020

**EQUIPMENT DESCRIPTION:**

55 MW COGENERATION UNIT INCLUDING 45 MW GENERAL ELECTRIC LM-6000PC GAS TURBINE WITH SELECTIVE CATALYTIC REDUCTION AND CO OXIDATION CATALYST, 10 MW STEAM TURBINE, AND HEAT RECOVERY STEAM GENERATOR WITH A HRSG BYPASS STACK

## PERMIT UNIT REQUIREMENTS

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1. The HRSG bypass stack shall only be utilized when the main stack is not utilized (except during transition periods between the stacks) and the HRSG bypass stack shall be subject to all of the same requirements as the main stack at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The owner/operator shall perform an initial relative accuracy test as specified by 40 CFR Part 60 Appendix B to certify the new stack probe in the HRSG bypass stack, and every 720 stack operating hours per 40 CFR Part 75 Appendix B Section 2.3.3 thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit
3. Calibration gas audit linearity checks shall be performed quarterly or every 168 stack operating hours per 40 CFR Part 75 Appendix B Section 2.2.4. [District Rule 1080] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
7. This unit shall be fired exclusively on PUC-quality natural gas and the PUC-quality natural gas shall have a total sulfur content less than or equal to 1.0 gr/100 scf. [40 CFR 60.333(b) and District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
8. The fuel sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If the fuel sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the monitoring frequency shall be every 6 months. If any six-month monitoring tests result in a fuel sulfur content exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
9. Gas turbine heat input shall not exceed 2,824,250 MMBtu/year based on a 12-month rolling sum. Compliance with this limit shall be determined at the end of each month. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Units subject to the Specific Limiting Condition (SLC) plan are C-14-10 and '-11. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Combined emission rate for all units subject to the SLC plan shall not exceed any of the following: 120.9 lb-PM10/day, 50.9 lb-SOx/day, 209.2 lb-NOx/day, 562.7 lb-CO/day, or 45.7 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The combined annual emissions rates for all units subject to the SLC plan shall not exceed either of the following: 48,539 lb-NOx/year or 199,889 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Gas turbine engine and generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater except for up to three minutes in any hour. [District NSR Rule] Federally Enforceable Through Title V Permit
14. For each unit subject to the SLC, the permittee shall maintain all necessary records in order to show compliance with the daily and annual SLC limits, including (but not limited to) the following: 1) amount of fuel used, 2) HHV of fuel, 3) calculated daily emissions for each air contaminant emitted, and 4) daily emissions measured by CEMS. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emission rate, or Permit to Operate is surrendered or sold. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Except during thermal stabilization, emission rates from the gas turbine shall not exceed any of the following: 2.0 ppmvd NOx @ 15% O2 (based on a 3-hour rolling average), 1.25 lb-SOx/hr, 2.85 lb-PM10/hr, 20 ppmv CO @ 15% O2, 2 ppmv VOC @ 15% O2, or 10 ppmv-ammonia @ 15% O2 (based on a 1-hour rolling average). [40 CFR 60.332, District NSR and District Rules 4703, 5.1 and 5.2 and 4102] Federally Enforceable Through Title V Permit
17. During thermal stabilization, emissions rates from the gas turbine shall not exceed any of the following: 20 lb-NOx/hr (based on a 3-hour rolling average), 1.25 lb-SOx/hr, 2.85 lb-PM10/hr, 19.40 lb-CO/hr (based on a 3-hour rolling average), 1.12 lb-VOC/hr, or 20 ppmv-ammonia @ 15% O2 (based on a 1-hour rolling average). [40 CFR 60.332, District NSR Rule and District Rules 4703, 5.1 and 5.2 and 4102] Federally Enforceable Through Title V Permit
18. Ammonia slip shall be calculated as follows: ammonia slip ppmv @ 15% O2 =  $\{[a-(b \times c/1,000,000)] \times 1,000,000/b\}$ , where a = ammonia injection rate (lb/hr)/17 (lb/lb mol), b = dry exhaust gas flow rate (lb/hr)/29 (lb/lb mol), and c = change in measured NOx concentration ppmv at 15% O2 across the catalyst. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The thermal stabilization period shall be defined as the start up or shut down time during which the exhaust gas is not within the normal operating temperature range, not to exceed two hours. [District Rule 4703, 3.25] Federally Enforceable Through Title V Permit
20. Compliance testing to measure the PM10, NOx (as NO2), VOC, CO, ammonia emissions, and fuel gas sulfur of this permit unit shall be conducted at least once every twelve months. [District Rules 2201, 4703, 6.3, 40 CFR 60.332(a), (b), and 40 CFR 60.333] Federally Enforceable Through Title V Permit
21. The following test methods shall be used. PM10: EPA Method 5 (front half and back half) or EPA Method 201A/202, NOx: EPA Method 7E or 20, CO: EPA Method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA Method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081; District Rule 4703, 6.4; and 40 CFR 60.335(b)] Federally Enforceable Through Title V Permit
22. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.332(a)(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
23. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [40 CFR 60.335(b)(3) and District Rule 4703] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. For units equipped with CEM, CEM records shall be used in place of calculated emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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27. Permittee 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] Federally Enforceable Through Title V Permit
28. The District shall be notified in writing within 10 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] Federally Enforceable Through Title V Permit
29. The owner or operator shall install, certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO<sub>x</sub> (before and after the SCR catalyst) and O<sub>2</sub> concentrations. The CEMS 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 1080, 2201, and 4703] Federally Enforceable Through Title V Permit
30. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.334(b)(2) and District Rule 1080] Federally Enforceable Through Title V Permit
31. Results of the CEM system shall be averaged over three hour periods using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NO<sub>x</sub>, EPA Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for SO<sub>2</sub>, or, if continuous emission monitors are used, all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
32. The NO<sub>x</sub>, CO, and O<sub>2</sub> CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60 Appendix B Performance Specifications 2, 3, and 4A. [40 CFR 60.334(b)(1) and District Rule 1080] Federally Enforceable Through Title V Permit
33. 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, calibration, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements. [40 CFR 60.7(b) and District Rule 1080] Federally Enforceable Through Title V Permit
34. Audits of continuous emissions monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
35. Permittee shall comply with all applicable source sampling requirements of District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
36. The owner/operator shall perform a relative accuracy test (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
37. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. this summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
38. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO<sub>x</sub> emissions, nature and the cause of excess (if known), corrective actions taken and preventative measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period and used to determine compliance with an emissions 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) and District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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39. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Results of the CEM system 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 California Air Resources Board, and the Environmental Protection Agency. [District Rule 1080, 6.0] Federally Enforceable Through Title V Permit
41. In the event of a breakdown of monitoring equipment, the owner shall notify the APCO as soon as reasonably possible, but no later than eight (8) hours after its detection, unless the owner or operator demonstrates to the APCO's satisfaction that a longer reporting period was necessary, and shall initiate repairs. The owner shall inform the APCO of the intent to shut down any monitoring equipment at last 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
42. Permittee shall maintain records of the following: 1) the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the permit unit; 2) performance testing, evaluations, calibrations, checks, adjustments, and maintenance of CEMS; and 3) emission measurements. [District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
43. Permittee shall maintain records of the following: 1) annual hours of operation, 2) daily and annual fuel consumption, 3) daily and annual continuous emission monitor measurements, 4) daily calculated ammonia slip, and 5) daily and annual emission rates. [District Rules 2201 and 4703, 6.2.6] Federally Enforceable Through Title V Permit
44. Permittee shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: 1) time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 2) 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; 3) applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and 4) the nature of system repairs and adjustments; 5) a negative declaration when no excess emissions occurred. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
45. Permittee shall maintain on file copies of natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
46. A violation of emission standards indicated by the CEM system shall be reported to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
47. The minimum ammonia injection rate shall be reported to the District and the injection rate shall be monitored during CEM breakdowns to demonstrate NOx emission compliance. [District Rule 4703, 6.2.5] Federally Enforceable Through Title V Permit
48. The permittee shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rule 4703, 6.2.4 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
49. The permittee shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, and calculated NOx mass emission rates (lb/hr). [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
50. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
51. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) Have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

52. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
53. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
54. The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit
55. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit
56. An affected unit shall be subject to the sulfur dioxide requirements starting on the later of January 1, 2000, or the deadline for monitoring certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3) that is not a substitution or compensating unit. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit
57. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit
58. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit
59. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit
60. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit
61. The owners and operators of each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides. [40 CFR 72] Federally Enforceable Through Title V Permit
62. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
63. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
64. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

65. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit

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

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation  
Fresno Cogeneration Partners  
C-14**

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Cogeneration Operation**

**Engineer:** Robert Rinaldi  
**Date:** 8/31/2016

**Facility Number:** C-14  
**Facility Name:** Fresno Cogeneration Partners  
**Mailing Address:** 81 05B S. Lassen Avenue  
San Joaquin, CA 93660

**Contact Name:** Harold Ditmer, President  
**Phone:**

**Responsible Official:** Harold Ditmer  
**Title:** President

**Project # :** C-1150578  
**Deemed Complete:** March 10, 2015

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**I. PROPOSAL**

Fresno Cogeneration Partners was issued a Title V permit on December 20, 2000. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the 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. The last Title V permit renewal was issued on 8/31/2010. This review will span from 8/31/2010 to the present.

**II. FACILITY LOCATION**

Fresno Cogeneration Partners is located at 8105B S. Lassen Avenue, San Joaquin, CA.

## II. EQUIPMENT LISTING

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

## IV. GENERAL PERMIT TEMPLATE USAGE

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

## V. SCOPE OF EPA AND PUBLIC REVIEW

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

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated during this current renewal review interval (8/31/2010 to present)

- District Rule 2020, Exemptions  
(amended December 20, 2007 ⇒ amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule  
(amended December 18, 2008 ⇒ amended May 21, 2011)
- District Rule 2410, Prevention of Significant Deterioration  
(became effective on November 26, 2012)
- District Rule 4702, Internal Combustion Engines – Phase 2  
(amended January 18, 2007 ⇒ November 14, 2013)
- 40 CFR Part 60, Subpart GG, New Source Performance Standards: Standard of Performance for Stationary Gas Turbines (amended February 27, 2014)
- 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (amended January 30, 2013)

- 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (amended March 6, 2013)
- 40 CFR Part 82, Subpart B, Stratospheric Ozone (amended June 25, 2013)
- 40 CFR Part 82, Subpart F, Stratospheric Ozone (amended June 25, 2013)

**B. Rules Removed during this current renewal review interval (8/31/2010 to present)**

- None.

**C. Rules Added during this current renewal review interval (8/31/2010 to present)**

- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011, effective November 26, 2012)

**D. Rules Not Updated during this current renewal review interval (8/31/10 to present)**

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)

- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4102, Nuisance (amended December 17, 1992)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 4701, Internal Combustion Engines – Phase I (amended August 21, 2003)
- District Rule 4703, Stationary Gas Turbines (amended September 20, 2007)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 8011 - General Requirements (amended August 19, 2004)
- District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (amended August 19, 2004)
- District Rule 8031 - Bulk Materials (amended August 19, 2004)
- District Rule 8041 - Carryout and Trackout (amended August 19, 2004)
- District Rule 8051 - Open Areas (amended August 19, 2004)
- District Rule 8061 - Paved and Unpaved Roads (amended August 19, 2004)



- District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area (amended September 16, 2004)
- 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (amended July 11, 2006)
- 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines (amended July 6, 2006)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (amended September 18, 2003)
- 40 CFR Part 63 Subpart YYYY—National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (amended March 5, 2004)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM) (amended October 10, 1997)
- 40 CFR Part 68, Chemical Accident Prevention Provisions (amended April 9, 2004)

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

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

### A. Rules Added

There are no new rules that are not federally enforceable being added at this time.

### B. Rules Not Updated

- District Rule 4102, Nuisance (as amended December 17, 1992)

For this facility, condition #41 of the facility wide requirements C-14-0-4 is based on District Rule 4102 listed above and is not Federally Enforceable through Title V.

- Title 17, California Code of Regulations, Section 92000 through 92540

No changes were made to these rules since the renewed Title V permit was issued, therefore, they will not be discussed any further.

### C. Rules Updated

- Title 17, California Code of Regulations, Section 93115 Airborne Toxic Control Measure for Stationary Compression Ignition Engines

This regulation is intended to reduce diesel particulate matter and criteria pollutant emissions from stationary diesel-fueled compression ignition (CI) engines. Aside from exempted engines, this Airborne Toxic Control Measure (ATCM) applies to any person who owns or operates a stationary CI engine in California with a rated bhp greater than 50. Requirements of this rule include a limit on diesel PM emissions of 0.40 g/bhp-hr for in-use emergency standby diesel-fired engines, and a limit of

20 hours per year of operation for maintenance and testing purposes. Engines powering a firewater pump are exempt from the 20 hours per year limitation. The rule also requires that the facility keep a monthly log that documents the fuel used as well as hours of operation for emergency use, maintenance and testing, initial start-up, compliance with the requirements of the National Fire Protection Agency (NFPA) 25, and all other uses. Fuel use is documented through the retention of fuel purchase records.

This rule was originally adopted on 26 February 2004 and was last amended 19 May 2011.

This regulation has been changed since the Title V permit was last issued. The changes do not affect the overall applicability or requirements as they are applied to sources at this facility.

The 136 bhp diesel-fired emergency engine (C-14-4-3) and 534 bhp diesel fired emergency engine (C-14-5-3) are subject to the requirements of this rule and will continue to comply with the monitoring, recordkeeping, and reporting requirements of this rule.

## VIII. FEDERALLY ENFORCEABLE PERMIT REQUIREMENTS

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

### A. District Rule 2020 - Exemptions

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

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

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

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

Therefore, the updated requirements of this rule are not applicable at this time.

Due to the deletion of PTOs C-14-1, '-2 and '-12 the following condition on C-14-10 and '-11 will be modified:

Units subject to the Specific Limiting Condition (SLC) plan are C-14-~~1, '-2,~~ '-10, '-11 ~~and '-12.~~ [District Rule 2201] Y

**C. District Rule 2410 – Prevention of Significant Deterioration**

The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant. The provisions of this rule apply to any source and the owner or operator of any source subject to any requirement under Title 40 Code of Federal Regulations (40 CFR) Part 52.21 as incorporated into this rule.

The rule did not create new requirements, but merely transfers the authority for the 40 CFR Part 52.21 requirements to the District. Prior to adoption of this rule, that authority was vested with the USEPA. This action does not involve construction and thus does not trigger additional PSD requirements for this source. Therefore, the facility is not subject to this rule and no further discussion is required.

**D. District Rule 2520 - Federally Mandated Operating Permits**

**Greenhouse Gas Requirements**

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

In addition, the following conditions reference the wrong CFR Part and need to be corrected. Proposed changes are shown in ~~strikeout~~ and underline format.

- Condition 49 of PTO C-14-11-10 references District Rule 2529, however this is incorrect and the condition should reference District Rule 2520.

The permittee shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, and calculated NOx mass emission rates (lb/hr). [District Rules 2201 and 25209, 9.4.2] Federally Enforceable Through Title V Permit

**E. District Rule 4702 - Internal Combustion Engines**

Emergency standby IC engines C-14-4 and '5 are only subject to administrative requirements of Rule 4702 which weren't revised in the latest amendment.

There are no changes to any of the existing Rule 4702 conditions.

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

This requirement limits emissions of nitrogen oxides. Emissions shall not exceed a NO<sub>x</sub> emission rate of 75 ppmv or 150 ppmv, depending on the unit size (at 15% O<sub>2</sub> with the ISO correction factor). The following analysis shows that the proposed requirement of District Rule 4703 is more stringent than 40 CFR requirements pertaining to NO<sub>x</sub> emissions. Streamlining procedures, as documented in the following steps is utilized to substitute the proposed set of requirements for the otherwise applicable requirements.

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

Type of Requirement	District Rule 4703	Subpart GG, § 60.332, 60.333 and 60.334	Proposed Requirement
Emissions Limit	Section 5.1.2 - for > 10 MW, 5 ppmv @ 15% O <sub>2</sub> . (Tier II Standard Option)	60.332(a)(1) – 75 ppmv @ 15% O <sub>2</sub> . (Lowest possible concentration) 60.333(a) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015% by volume at 15% oxygen and on a dry basis.	C-14-10: 5.0 ppmv @ 15% O <sub>2</sub>  C-14-11: 2.0 ppmv @ 15% O <sub>2</sub>
Work place standards	N/A	60.333(b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel, which contains sulfur in excess of 0.8% by weigh (8000 ppmw).	This unit shall be fired exclusively on PUC-quality natural gas which has a total sulfur content of less than or equal to 1.0 gr/100 scf

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Type of Requirement	District Rule 4703	Subpart GG, § 60.332, 60.333 and 60.334	Proposed Requirement
Monitoring	(6.2.1) Except for units subject to Section 6.2.3, for turbines with exhaust gas NO <sub>x</sub> control devices, the owner or operator shall either install, operate, and maintain continuous emissions monitoring equipment for NO <sub>x</sub> and oxygen, as identified in Rule 1080 (Stack Monitoring), or install and maintain APCO-approved alternate monitoring	60.334(a) The owner or operator of any stationary gas turbine subject to the provisions of this subpart and using water injection to control NO <sub>x</sub> emissions shall install or operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. 60.334(b) Install, certify, maintain, operate, and quality-assure a continuous emissions monitoring system for NO <sub>x</sub> and O <sub>2</sub> . 60.334(h)(3) The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) demonstrated by representative fuel sampling data which shows that sulfur content of gas does not exceed 0.25 gr/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of Appendix D of 40 CFR part 75 is required	The owner or operator shall install, , certify, maintain, operate, and quality-assure a system which continuously measures and records the exhaust gas NO <sub>x</sub> and O <sub>2</sub> concentrations.  The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six (6) months. If any six (6) month monitoring show exceedance, weekly monitoring shall resume and exceedance shall be reported to APCO

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Type of Requirement	District Rule 4703	Subpart GG, § 60.332, 60.333 and 60.334	Proposed Requirement
Reporting	As per District Rule 1080: Time intervals, data and magnitude of excess NOx emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative, except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred	60.334(J) the owner or operator shall submit reports of excess emissions and monitor downtime as required under §60.7(c), periods of excess emissions that shall be reported are defined as follows: 60.334(J)(1)(iii) - An hour of excess emissions shall be any operating hour in which 4-hour rolling average NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or diluent (or both). 60.334(J)(5): all reports required under §60.7(c) shall be post marked by 30 <sup>th</sup> day following the end of each calendar quarter.	<p>Permittee 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] Y</p> <p>In the event of a breakdown of monitoring equipment, the owner shall notify the APCO as soon as reasonably possible, but no later than eight (8) hours after its detection, unless the owner or operator demonstrates to the APCO's satisfaction that a longer reporting period was necessary, and shall initiate repairs. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the event. [District Rule 1080, 10.0] Y</p> <p>A violation of emissions standards indicated by the CEM system shall be reported to the APCO within 96 hours. [District Rule 1080, 9.0] Y</p> <p>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] Y</p>
Testing	Annual Testing for nitrogen oxides (NOx) concentrations using EPA Method 20 or 7E and oxygen (O <sub>2</sub> ) using Method 3, 3A, or 20.	Initial NOx performance testing using EPA method 20 or 7E and EPA method 3, 3A for O <sub>2</sub> .	<p>Compliance testing to measure the PM10, NOx (as NO<sub>2</sub>), VOC, CO, ammonia emissions, and fuel gas sulfur content of this permit unit shall be conducted at least once every twelve months. [District Rules 2201 and 4703, 6.3 and 40 CFR 60.332 (a), (b) and 40 CFR 60.333] Y</p> <p>The following test methods shall be used. PM10: EPA Method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA Method 10 or 10B, O<sub>2</sub>: EPA Method 3, 3A, or 20, VOC: EPA Method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 4703, 6.4, and 40 CFR 60.335(b)] Y</p>



The District Rule 4703 requirement to limit NO<sub>x</sub> concentration to 5 ppmv @ 15% O<sub>2</sub> is clearly more stringent than the Subpart GG emissions limit of 75 ppmv as discussed below. The draft PTO assures compliance with this requirement.

Compliance with SO<sub>x</sub> Emission Concentration Limit - 60.333(a):

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

As referenced in PG&E Gas Rule No. 21 (dated 5/24/2009), 1.0 gr S/100 scf is the sulfur content of gas supplied by a utility regulated by the Public Utilities Commission (PUC).

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

Compliance is expected as shown by the following calculations at 1.0 grain of total sulfur per 100 standard cubic feet of gas, assuming all sulfur is converted to SO<sub>2</sub>.

$$\begin{aligned} \%S(\text{lb/lbNG}) &= \left( \frac{1.0 \text{ gr}}{100 \text{ scf}} \right) \left( \frac{1 \text{ lb}}{7000 \text{ gr}} \right) \left( \frac{24.5 \text{ L}}{\text{mol NG}} \right) \left( \frac{1 \text{ mol}}{16 \text{ g}} \right) \left( \frac{454 \text{ g}}{1 \text{ lb}} \right) \left( \frac{0.035 \text{ scf}}{1 \text{ L}} \right) (100) \\ &= 0.0035\% \text{ sulfur by weight} \end{aligned}$$

$$\begin{aligned} \text{lb SO}_2/\text{scf gas} &= (0.000035)(1 \text{ lb}/23.8 \text{ scf gas})(64 \text{ lb SO}_2/32 \text{ lb S}) \\ &= 3.1 \text{ E-}6 \text{ lb SO}_2/\text{scf gas} \end{aligned}$$

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

$$\left( \frac{\text{lb SO}_2}{V_{\text{exhaust}}} \right) = \frac{\left( 3.1 \text{ E-}6 \frac{\text{lb SO}_2}{\text{scf gas}} \right) \left( \frac{10^6 \text{ Btu}}{\text{MMBtu}} \right)}{\left( 8710 \frac{\text{dscf}}{\text{MMBtu}} \right) \left( 1000 \frac{\text{Btu}}{\text{scf}} \right)} = 3.68 \text{ E-}7 \frac{\text{lb SO}_2}{\text{dscf exhaust}}$$

$$V_{SO_2}/V_{\text{exhaust}} = nRT/P$$

where,

$$\begin{aligned} n &= \text{moles } SO_2 = (3.35 \text{ E-}7 \text{ lb } SO_2/\text{dscf exhaust}) / (64 \text{ lb } SO_2/\text{lb-mol}) \\ R &= \text{universal gas constant} = 10.73 \text{ psi-ft}^3/\text{lb-mol-R} \\ T &= \text{standard temperature} = 60 \text{ }^\circ\text{F} = 520 \text{ }^\circ\text{R} \\ P &= \text{standard pressure} = 14.7 \text{ psi} \end{aligned}$$

$$\begin{aligned} \text{Therefore, } \left( \frac{V_{SO_2}}{V_{\text{exhaust}}} \right) &= \frac{\left( \frac{3.6 \text{ E-}6 \text{ lb } SO_2}{\text{dscf exhaust}} \right) \left( \frac{10.73 \text{ psi-ft}^3}{\text{lb-mol-R}} \right) (520 \text{ }^\circ\text{R})}{\left( \frac{64 \text{ lb } SO_2}{\text{lb-mol}} \right) (14.7 \text{ psi})} = 2.1 \text{ E-}6 \frac{\text{dscf}}{\text{dscf exhaust}} \\ &= 2.1 \text{ ppmv dry} \end{aligned}$$

Diluting it to 15% O<sub>2</sub>

$$\text{ppmv @15\% O}_2 = \text{ppmv dry} \times \left( \frac{20.9 - 15}{20.9} \right) = 0.6 \text{ ppmv}$$

0.6 ppmv << 150 ppmv.

Compliance with 150 ppmv SO<sub>x</sub> at 15% excess O<sub>2</sub> and dry standard conditions and 2,000 ppmv is assured because the unit has a fuel sulfur content of 1.0 gr/100 scf. The turbine permits ensures compliance with this rule and condition.

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

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

$$\begin{aligned} \%S(\text{lb/lbNG}) &= \left( \frac{1.0 \text{ gr}}{100 \text{ scf}} \right) \left( \frac{1 \text{ lb}}{7000 \text{ gr}} \right) \left( \frac{24.5 \text{ L}}{\text{mol NG}} \right) \left( \frac{1 \text{ mol}}{16 \text{ g}} \right) \left( \frac{454 \text{ g}}{1 \text{ lb}} \right) \left( \frac{0.035 \text{ scf}}{1 \text{ L}} \right) (100) \\ &= 0.0035\% \text{ sulfur by weight} \end{aligned}$$

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

In addition, the following conditions reference the wrong CFR Part and need to be corrected. Proposed changes are shown in ~~strikeout~~ and underline format.

- Condition 28 of PTO C-14-10-6 references 40 CFR §50.334(b), however this is incorrect and the condition should reference 40 CFR §60.334(b).

28. The owner or operator shall install, certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO<sub>x</sub> (before and after the SCR catalyst), CO, and O<sub>2</sub> concentrations. The CEMS shall be capable of monitoring emissions during startups and shutdowns, as well as during normal operating conditions. [40 CFR ~~560~~.334(b) and District Rules 1080, 2201, and 4703] Federally Enforceable Through Title V Permit

- Condition 39 of PTO C-14-10-6 references 40 CFR §60.335(c)(2), however this is incorrect and the condition should reference 40 CFR §60.335(b)(2).

39. Proposed Condition: The continuous monitor of fuel, water, and water-to-fuel ratio system shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the NO<sub>x</sub> emissions limits at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer, [40 CFR 60.335(~~e~~b)(2)) Federally Enforceable Through Title V Permit

- Condition 29 of PTO C-14-11-10 references 40 CFR §50.334(b), however this is incorrect and the condition should reference 40 CFR §60.334(b).

29. The owner or operator shall install, certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO<sub>x</sub> (before and after the SCR catalyst) and O<sub>2</sub> concentrations. The CEMS shall be capable of monitoring emissions during startups and shutdowns, as well as during normal operating conditions. [40 CFR ~~560~~.334(b) and District Rules 1080, 2201, and 4703] Federally Enforceable Through Title V Permit

**G. 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

Subpart IIII requirements apply to stationary compression ignition internal combustion engines as specified. This regulation was adopted on 11 July 2006 and was last amended on 30 January 2013. This is a Federal rule; therefore, this rule is federally enforceable through Title V.

Subpart IIII requirements apply to stationary compression ignition internal combustion engines that commence construction after 11 June 2005.

There are no engines at the facility subject to the Subpart IIII requirements, since both the 136 bhp diesel-fired engine powering a fire water pump and the 534 bhp diesel-fired engine powering an emergency generator were installed at the facility prior to 11 June 2005. Neither of these units have been modified or reconstructed since.

**H. 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)**

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

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

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

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

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

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

- (i) For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.
- (ii) For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
- (iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

- (iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

This facility is an area source of HAP emissions. The engines at this facility have not commenced construction or reconstruction on or after June 12, 2006. Therefore, the engines at this facility meet the definition of an existing stationary RICE as defined in §6590(a)(1)(iii).

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

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

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

**I. 40 CFR Part 64, Compliance Assurance Monitoring (CAM)**

The USEPA 40 CFR Part 64 requirements apply to any pollutant specific emission unit (PSEU) at a major source that is required to obtain a Part 70 permit if the unit satisfies all of the following criteria:

- The unit is subject to an emission limitation or standard for an applicable regulated air pollutant;
- The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- The unit has a pre-control device potential to emit (uncontrolled emissions) of the applicable regulated air pollutant equal to or greater than:
  - 10 tons per year of VOC
  - 10 tons per year of NO<sub>x</sub>
  - 70 tons per year of PM<sub>10</sub>
  - 70 tons per year of SO<sub>x</sub>
  - 100 tons per year of CO

A PSEU refers to an emission unit treated separately for each regulated air pollutant. In determining the pre-control device potential to emit from a PSEU, limits on hours of operation, throughput, or fuel consumption may be used provided that the limit is contained in a Part 70 permit condition.

Part 64 also contains a number of exemptions. The following are some examples of emission limitations or standards explicitly exempt from CAM requirements:

- Ones proposed by EPA after November 15, 1990, including NSPS and MACT standards;
- Ones for which a Part 70 permit already specifies a continuous compliance determination method, as defined in 40 CFR Part 64.1;
- An emission cap that meets the requirements specified in 40 CFR Part 70.4(b)(12); and
- Acid Rain Program requirements of Title IV.

In addition, control devices equipped with continuous emissions monitors are exempt from CAM under the continuous compliance determination method exemption.

A CAM applicability review was conducted for the various emission units at the facility:

**C-14-4-3:** 136 bhp Diesel-Fired Emergency Standby Internal Combustion Engine

The unit does not have any add-on control devices and therefore is not subject to CAM.

**C-14-5-3:** 534 bhp Diesel-Fired Emergency Standby Internal Combustion Engine

The unit does not have any add-on control devices and therefore is not subject to CAM

**C-14-10-6:** 23 MW Electrical Generator

For NO<sub>x</sub> and CO, this permit unit is equipped with continuous emissions monitoring system (CEMS) for criteria air pollutants. Therefore, this permit unit is exempt from the CAM requirements.

For SO<sub>x</sub> and PM<sub>10</sub>, this unit is not subject to CAM since it does not have any add-on control device for those pollutants.

For VOC, the uncontrolled emission factor from AP-42 Table 3.1-2a (4/00) is:  $2.1 \times 10^{-3}$  lb VOC/MM Btu. The turbine is limited to 1,320,000 MMBtu/year. Uncontrolled emissions are 2,772 lb VOC/yr., which is less than the 20,000 lb VOC /yr. CAM applicability threshold. CAM requirements are not required for VOC emissions.

**C-14-11-9:** 55 MW Cogeneration Unit

For NO<sub>x</sub> and CO, this permit unit is equipped with continuous emissions monitoring system (CEMS) for criteria air pollutants. Therefore, this permit unit is exempt from the CAM requirements.

For SO<sub>x</sub> and PM<sub>10</sub>, this unit is not subject to CAM since it does not have any add-on control device for those pollutants.

For VOC, the uncontrolled emission factor from AP-42 Table 3.1-2a (4/00) is:  $2.1 \times 10^{-3}$  lb VOC/MM Btu. The turbine is limited to 2,824,250 MMBtu/year. Uncontrolled emissions are 5,930 lb VOC/yr., which is less than the 20,000 lb VOC /yr. CAM applicability threshold. CAM requirements are not required for VOC emissions.

CAM requirements are not necessary for any of these permit units.

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

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2013, and condition 28 of C-14-0-4 assure compliance with the requirements.

**IX. PERMIT SHIELD**

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

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

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

**B. Requirements not Addressed by Model General Permit Templates**

Fresno Cogeneration Partners is not requesting any new permit shields within this Title V renewal project. In addition, Fresno Cogeneration Partners is not requesting any changes to the existing permit shields already included in their Title V operating permits. Therefore, all of the existing permit shields will be maintained on the revised permits for this renewal project.

**C. Obsolete Permit Shields From Existing Permit Requirements**

There are no obsolete permit shield conditions to be removed from the permits.

**X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.



## **XI. ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit**
- B. Previous Title V Operating Permit**
- C. Detailed Facility List**
- D. EPA and CARB Comments and the District's Responses**

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-14-0-4

EXPIRATION DATE: 08/31/2015

## FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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: FRESNO COGENERATION PARTNERS  
Location: 8105 S LASSEN AVE, SAN JOAQUIN, CA 93680  
C-14-0-4 Jun 17 2016 1:58PM - RINALDIR

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and Rule 8011] Federally Enforceable Through Title V Permit

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} 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. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin December 20 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

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-14-4-6

EXPIRATION DATE 08/31/2015

**EQUIPMENT DESCRIPTION:**

136 BHP CUMMINS MODEL #V378F2 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIRE WATER PUMP

## PERMIT UNIT REQUIREMENTS

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1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed in concentration at the point of discharge 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the initial start-up hours, the number of hours of operation, and the purpose of the operation (for example, load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-14-5-6

EXPIRATION DATE: 08/31/2015

## EQUIPMENT DESCRIPTION:

534 HP CATERPILLAR DIESEL IC ENGINE MODEL 3406B POWERING AN EMERGENCY ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed in concentration at the point of discharge 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. During periods of maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example, oil pressure, exhaust gas temperature, etc.). [District Rule 4702] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the initial start-up hours, the number of hours of operation, the purpose of the operation (for example, load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 2520 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-14-10-11

EXPIRATION DATE: 08/31/2015

## EQUIPMENT DESCRIPTION:

23 MW ELECTRICAL GENERATOR POWERED BY A PRATT AND WHITNEY MODEL FT4A9 GAS-FIRED, SIMPLE CYCLE TURBINE ENGINE WITH DRY LOW NOX (DLN) TECHNOLOGY OR WATER INJECTION, A SELECTIVE CATALYTIC REDUCTIONS (SCR) SYSTEM, AN OXIDATION CATALYST, AN INLET AIR EVAPORATIVE COOLER, AND LUBE OIL VENT MIST ELIMINATORS

## PERMIT UNIT REQUIREMENTS

1. {2256} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
2. {2257} Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Gas turbine shall be equipped with a calibrated continuous monitoring system to measure and record hours of operation and fuel consumption. [District Rules 2201, 2520 9.4.2, and 4703 6.2.1] Federally Enforceable Through Title V Permit
5. The gas turbine engine and generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater except for up to three minutes in any hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heat input to the turbine shall not exceed 1,320,000 MMBtu/year based on a 12-month rolling sum. Compliance with this limit shall be determined at the end of each month. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Units subject to the Specific Limiting Condition (SLC) plan are C-14-10 and '-11. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Combined emission rate for all units subject to the SLC plan shall not exceed any of the following: 120.9 lb-PM10/day, 50.9 lb-SOx/day, 209.2 lb-NOx/day, 562.7 lb-CO/day, or 45.7 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The combined annual emissions rates for all units subject to the SLC plan shall not exceed either of the following: 48,539 lb-NOx/year or 199,889 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emissions rate, or Permit to Operate is surrendered or sold. [District Rule 2201] Federally Enforceable Through Title V Permit
11. For each unit subject to the SLC, the permittee shall maintain all necessary records in order to show compliance with the daily and annual SLC limits, including (but not limited to) the following: 1) amount of fuel used, 2) HHV of fuel, 3) calculated daily emissions for each air contaminant emitted, 4) daily emissions measured by CEMS, 5) and calculated combined annual emissions for NOx and CO. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. This unit shall be fired exclusively on PUC-quality natural gas and the PUC-quality natural gas shall have a total sulfur content of less than or equal to 1.0 gr/100 scf. [40 CFR 60.333(b) and District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
13. The fuel sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, or tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or GAS Processors Association Standard 2377. If the fuel sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the monitoring frequency shall be every 6 months. If any six-month monitoring tests result in a fuel sulfur content exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
14. Except during transitional operation period, emission rates from the gas turbine shall not exceed any of the following: PM10: 2.22 lb/hr, SOx (as SO2): 0.98 lb/hr, NOx (as NO2): 5.0 ppmvd @ 15% O2 and 6.20 lb/hr (based on a 3-hour average), VOC: 2.0 ppmvd @ 15% O2 and 0.88 lb/hr, CO: 12.0 ppmvd @ 15% O2 and 8.07 lb/hr (based on a 3-hour rolling average), or ammonia: 10 ppmvd @ 15% O2 (based on a 1-hour rolling average). [District Rules 2201, 4102, 4301, 4703 and 40 CFR Part 60 Subpart GG] Federally Enforceable Through Title V Permit
15. During transitional operation period, emission rates from the gas turbine shall not exceed any of the following: PM10: 2.22 lb/hr, SOx (as SO2): 0.98 lb/hr, NOx (as NO2): 20 lb/hr (based on a 3-hour rolling average), VOC: 0.88 lb/hr, CO: 8.07 lb/r (based on a 3-hour rolling average), or ammonia: 20 ppmvd @ 15% O2 (based on a 1-hour rolling average). [District Rules 2201, 4102, 4301, 4703 and 40 CFR Part 60 Subpart GG] Federally Enforceable Through Title V Permit
16. Transitional operation period shall be any of the following periods as they are define in Rule 4703: bypass transition period, primary re-ignition period, reduced load period start-up or shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
17. Permittee 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] Federally Enforceable Through Title V Permit
18. In the event of a breakdown of monitoring equipment, the owner shall notify the APCO as soon as reasonably possible, but no later than eight (8) hours after its detection, unless the owner or operator demonstrates to the APCO's satisfaction that a longer reporting period was necessary, and shall initiate repairs. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
19. A violation of emissions standards indicated by the CEM system shall be reported to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
20. 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] Federally Enforceable Through Title V Permit
21. Compliance with the ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 =  $((a-(bxc/1,000,000)) \times 1,000,000/b)$ , where a = ammonia injection rate (lb/hr)/17 lb/lb.mol, b = dry exhaust gas flow rate (lb/hr)/29(lb/lb.mol), and c = change in measure NOx concentration ppmv @ 15% O2 across catalyst. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Compliance testing to measure the PM10, NOx (as NO2), VOC, CO, ammonia emissions, and fuel gas sulfur content of this permit unit shall be conducted at least once every twelve months. [District Rules 2201 and 4703, 6.3 and 40 CFR 60.332 (a), (b) and 40 CFR 60.333] Federally Enforceable Through Title V Permit
23. The following test methods shall be used. PM10: EPA Method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA Method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA Method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 4703, 6.4, and 40 CFR 60.335(b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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24. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.332(a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
25. Permittee shall comply with all applicable source sampling requirements of District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
26. 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. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Compliance demonstration (source testing) shall be District witnessed, or authorized and the samples shall be collected by a California Air Resources Board certified testing laboratory. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days of source testing. [District Rule 1081] Federally Enforceable Through Title V Permit
28. The owner or operator shall install, certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx (before and after the SCR catalyst), CO, and O2 concentrations. The CEMS 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 1080, 2201, and 4703] Federally Enforceable Through Title V Permit
29. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.334(b)(2) and District Rule 1080] Federally Enforceable Through Title V Permit
30. Results of the CEM system shall be averaged over three hour periods using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NOx, EPA Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for O2, or all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703 5.1, 6.4] Federally Enforceable Through Title V Permit
31. 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. [40 CFR 60.334(b)(1) and District Rule 1080] Federally Enforceable Through Title V Permit
32. 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, calibration, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements. [40 CFR 60.7(b) and District Rule 1080] Federally Enforceable Through Title V Permit
33. Audits of continuous emissions monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
34. The owner/operator shall perform a relative accuracy test (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
35. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. this summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit

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

36. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventative measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period and used to determine compliance with an emissions 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) and District Rule 1080] Federally Enforceable Through Title V Permit
37. The owner or operator shall report periods of excess emissions that are defined as follows: any one-hour period during which the average-water-to-fuel ratio (when the CEMS is not operational and Dry-Low NOx technology is not being used), as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the NOx emission limit. Each report shall include average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. [40 CFR 60.334(c)(1)] Federally Enforceable Through Title V Permit
38. Results of the CEM system 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 California Air Resources Board, and the Environmental Protection Agency. [District Rule 1080, 6.0] Federally Enforceable Through Title V Permit
39. The continuous monitor of fuel, water, and water-to-fuel ratio system shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the NOx emissions limits at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. [40 CFR 60.335(b)(2)] Federally Enforceable Through Title V Permit
40. The minimum ammonia injection rate shall be reported to the District and the injection rate shall be monitored by the operator during CEM breakdowns to demonstrate NOx emission compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
41. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
42. The permittee shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rule 4703, 6.2.4 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
43. The permittee shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, and calculated NOx mass emission rates (lb/hr). [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
44. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

DRAFT

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-14-11-11

EXPIRATION DATE: 08/31/2015

## EQUIPMENT DESCRIPTION:

55 MW COGENERATION UNIT INCLUDING 45 MW GENERAL ELECTRIC LM-6000PC GAS TURBINE WITH SELECTIVE CATALYTIC REDUCTION AND CO OXIDATION CATALYST, 10 MW STEAM TURBINE, AND HEAT RECOVERY STEAM GENERATOR WITH A HRSG BYPASS STACK

## PERMIT UNIT REQUIREMENTS

1. The HRSG bypass stack shall only be utilized when the main stack is not utilized (except during transition periods between the stacks) and the HRSG bypass stack shall be subject to all of the same requirements as the main stack at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The owner/operator shall perform an initial relative accuracy test as specified by 40 CFR Part 60 Appendix B to certify the new stack probe in the HRSG bypass stack, and every 720 stack operating hours per 40 CFR Part 75 Appendix B Section 2.3.3 thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit
3. Calibration gas audit linearity checks shall be performed quarterly or every 168 stack operating hours per 40 CFR Part 75 Appendix B Section 2.2.4. [District Rule 1080] Federally Enforceable Through Title V Permit
4. {2257} Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
6. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
7. This unit shall be fired exclusively on PUC-quality natural gas and the PUC-quality natural gas shall have a total sulfur content less than or equal to 1.0 gr/100 scf. [40 CFR 60.333(b) and District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
8. The fuel sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If the fuel sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the monitoring frequency shall be every 6 months. If any six-month monitoring tests result in a fuel sulfur content exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
9. Gas turbine heat input shall not exceed 2,824,250 MMBtu/year based on a 12-month rolling sum. Compliance with this limit shall be determined at the end of each month. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Units subject to the Specific Limiting Condition (SLC) plan are C-14-10 and -11. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Combined emission rate for all units subject to the SLC plan shall not exceed any of the following: 120.9 lb-PM10/day, 50.9 lb-SO<sub>x</sub>/day, 209.2 lb-NO<sub>x</sub>/day, 562.7 lb-CO/day, or 45.7 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The combined annual emissions rates for all units subject to the SLC plan shall not exceed either of the following: 48,539 lb-NOx/year or 199,889 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Gas turbine engine and generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater except for up to three minutes in any hour. [District NSR Rule] Federally Enforceable Through Title V Permit
14. For each unit subject to the SLC, the permittee shall maintain all necessary records in order to show compliance with the daily and annual SLC limits, including (but not limited to) the following: 1) amount of fuel used, 2) HHV of fuel, 3) calculated daily emissions for each air contaminant emitted, and 4) daily emissions measured by CEMS. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emission rate, or Permit to Operate is surrendered or sold. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Except during thermal stabilization, emission rates from the gas turbine shall not exceed any of the following: 2.0 ppmvd NOx @ 15% O2 (based on a 3-hour rolling average), 1.25 lb-SOx/hr, 2.85 lb-PM10/hr, 20 ppmv CO @ 15% O2, 2 ppmv VOC @ 15% O2, or 10 ppmv-ammonia @ 15% O2 (based on a 1-hour rolling average). [40 CFR 60.332, District NSR and District Rules 4703, 5.1 and 5.2 and 4102] Federally Enforceable Through Title V Permit
17. During thermal stabilization, emissions rates from the gas turbine shall not exceed any of the following: 20 lb-NOx/hr (based on a 3-hour rolling average), 1.25 lb-SOx/hr, 2.85 lb-PM10/hr, 19.40 lb-CO/hr (based on a 3-hour rolling average), 1.12 lb-VOC/hr, or 20 ppmv-ammonia @ 15% O2 (based on a 1-hour rolling average). [40 CFR 60.332, District NSR Rule and District Rules 4703, 5.1 and 5.2 and 4102] Federally Enforceable Through Title V Permit
18. Ammonia slip shall be calculated as follows: ammonia slip ppmv @ 15% O2 =  $\{[a-(b \times c/1,000,000)] \times 1,000,000/b\}$ , where a = ammonia injection rate (lb/hr)/17 (lb/lb mol), b = dry exhaust gas flow rate (lb/hr)/29 (lb/lb mol), and c = change in measured NOx concentration ppmv at 15% O2 across the catalyst. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The thermal stabilization period shall be defined as the start up or shut down time during which the exhaust gas is not within the normal operating temperature range, not to exceed two hours. [District Rule 4703, 3.25] Federally Enforceable Through Title V Permit
20. Compliance testing to measure the PM10, NOx (as NO2), VOC, CO, ammonia emissions, and fuel gas sulfur of this permit unit shall be conducted at least once every twelve months. [District Rules 2201, 4703, 6.3, 40 CFR 60.332(a), (b), and 40 CFR 60.333] Federally Enforceable Through Title V Permit
21. The following test methods shall be used. PM10: EPA Method 5 (front half and back half) or EPA Method 201A/202, NOx: EPA Method 7E or 20, CO: EPA Method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA Method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081; District Rule 4703, 6.4; and 40 CFR 60.335(b)] Federally Enforceable Through Title V Permit
22. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.332(a)(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
23. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [40 CFR 60.335(b)(3) and District Rule 4703] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. For units equipped with CEM, CEM records shall be used in place of calculated emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

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

27. Permittee 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] Federally Enforceable Through Title V Permit
28. The District shall be notified in writing within 10 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] Federally Enforceable Through Title V Permit
29. The owner or operator shall install, certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO<sub>x</sub> (before and after the SCR catalyst) and O<sub>2</sub> concentrations. The CEMS 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 1080, 2201, and 4703] Federally Enforceable Through Title V Permit
30. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.334(b)(2) and District Rule 1080] Federally Enforceable Through Title V Permit
31. Results of the CEM system shall be averaged over three hour periods using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NO<sub>x</sub>, EPA Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for SO<sub>2</sub>, or, if continuous emission monitors are used, all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
32. The NO<sub>x</sub>, CO, and O<sub>2</sub> CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60 Appendix B Performance Specifications 2, 3, and 4A. [40 CFR 60.334(b)(1) and District Rule 1080] Federally Enforceable Through Title V Permit
33. 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, calibration, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements. [40 CFR 60.7(b) and District Rule 1080] Federally Enforceable Through Title V Permit
34. Audits of continuous emissions monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
35. Permittee shall comply with all applicable source sampling requirements of District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
36. The owner/operator shall perform a relative accuracy test (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
37. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
38. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO<sub>x</sub> emissions, nature and the cause of excess (if known), corrective actions taken and preventative measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period and used to determine compliance with an emissions 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) and District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

39. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Results of the CEM system 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 California Air Resources Board, and the Environmental Protection Agency. [District Rule 1080, 6.0] Federally Enforceable Through Title V Permit
41. In the event of a breakdown of monitoring equipment, the owner shall notify the APCO as soon as reasonably possible, but no later than eight (8) hours after its detection, unless the owner or operator demonstrates to the APCO's satisfaction that a longer reporting period was necessary, and shall initiate repairs. The owner shall inform the APCO of the intent to shut down any monitoring equipment at last 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
42. Permittee shall maintain records of the following: 1) the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the permit unit; 2) performance testing, evaluations, calibrations, checks, adjustments, and maintenance of CEMS; and 3) emission measurements. [District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
43. Permittee shall maintain records of the following: 1) annual hours of operation, 2) daily and annual fuel consumption, 3) daily and annual continuous emission monitor measurements, 4) daily calculated ammonia slip, and 5) daily and annual emission rates. [District Rules 2201 and 4703, 6.2.6] Federally Enforceable Through Title V Permit
44. Permittee shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: 1) time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 2) 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; 3) applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and 4) the nature of system repairs and adjustments; 5) a negative declaration when no excess emissions occurred. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
45. Permittee shall maintain on file copies of natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
46. A violation of emission standards indicated by the CEM system shall be reported to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
47. The minimum ammonia injection rate shall be reported to the District and the injection rate shall be monitored during CEM breakdowns to demonstrate NOx emission compliance. [District Rule 4703, 6.2.5] Federally Enforceable Through Title V Permit
48. The permittee shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rule 4703, 6.2.4 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
49. The permittee shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, and calculated NOx mass emission rates (lb/hr). [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
50. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
51. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) Have an Acid Rain permit. [40 CFR 71] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



52. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
53. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
54. The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit
55. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit
56. An affected unit shall be subject to the sulfur dioxide requirements starting on the later of January 1, 2000, or the deadline for monitoring certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3) that is not a substitution or compensating unit. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit
57. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit
58. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit
59. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit
60. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit
61. The owners and operators of each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides. [40 CFR 72] Federally Enforceable Through Title V Permit
62. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
63. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
64. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit

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

65. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit

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

**DRAFT**

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# ATTACHMENT B

Previous Title V Operating Permit

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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



# Permit to Operate

**FACILITY:** C-14

**EXPIRATION DATE:** 08/31/2015

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

FRESNO COGENERATION PARTNERS  
8105-B S LASSEN AVE  
SAN JOAQUIN, CA 93660

**FACILITY LOCATION:**

8105 S LASSEN AVE  
SAN JOAQUIN, CA 93660

**FACILITY DESCRIPTION:**

COGENERATION

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

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

**Seyed Sadredin**  
Executive Director / APCO

**Arnaud Marjollet**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: C-14-0-2

EXPIRATION DATE: 08/31/2015

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (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. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: FRESNO COGENERATION PARTNERS  
Location: 8105 S LASSEN AVE, SAN JOAQUIN, CA 93860  
C-14-0-2: Jun 17 2016 11:00AM - RINALDIR

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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in 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
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) 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

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). 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. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin December 20 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

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-14-4-3

**EXPIRATION DATE:** 08/31/2015

**EQUIPMENT DESCRIPTION:**

136 BHP CUMMINS MODEL #V378F2 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIRE WATER PUMP

## PERMIT UNIT REQUIREMENTS

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1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed in concentration at the point of discharge 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the initial start-up hours, the number of hours of operation, and the purpose of the operation (for example, load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-14-5-3

EXPIRATION DATE: 08/31/2015

**EQUIPMENT DESCRIPTION:**

534 HP CATERPILLAR DIESEL IC ENGINE MODEL 3406B POWERING AN EMERGENCY ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Rule 406 (Fresno)] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed in concentration at the point of discharge 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 20 hours per calendar year. [District Rule and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. During periods of maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example, oil pressure, exhaust gas temperature, etc.). [District Rule 4702] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the initial start-up hours, the number of hours of operation, the purpose of the operation (for example, load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 2520 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-14-10-6

**EXPIRATION DATE:** 08/31/2015

**EQUIPMENT DESCRIPTION:**

23 MW ELECTRICAL GENERATOR POWERED BY A PRATT AND WHITNEY MODEL FT4A9 GAS-FIRED, SIMPLE CYCLE TURBINE ENGINE WITH DRY LOW NOX (DLN) TECHNOLOGY OR WATER INJECTION, A SELECTIVE CATALYTIC REDUCTIONS (SCR) SYSTEM, AN OXIDATION CATALYST, AN INLET AIR EVAPORATIVE COOLER, AND LUBE OIL VENT MIST ELIMINATORS

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
2. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Gas turbine shall be equipped with a calibrated continuous monitoring system to measure and record hours of operation and fuel consumption. [District Rules 2201, 2520 9.4.2, and 4703 6.2.1] Federally Enforceable Through Title V Permit
5. The gas turbine engine and generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater except for up to three minutes in any hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heat input to the turbine shall not exceed 1,320,000 MMBtu/year based on a 12-month rolling sum. Compliance with this limit shall be determined at the end of each month. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Units subject to the Specific Limiting Condition (SLC) plan are C-14-1, '-2, '-10, '-11, and '-12. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Combined emission rate for all units subject to the SLC plan shall not exceed any of the following: 120.9 lb-PM10/day, 50.9 lb-SOx/day, 209.2 lb-NOx/day, 562.7 lb-CO/day, or 45.7 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The combined annual emissions rates for all units subject to the SLC plan shall not exceed either of the following: 48,539 lb-NOx/year or 199,889 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emissions rate, or Permit to Operate is surrendered or sold. [District Rule 2201] Federally Enforceable Through Title V Permit
11. For each unit subject to the SLC, the permittee shall maintain all necessary records in order to show compliance with the daily and annual SLC limits, including (but not limited to) the following: 1) amount of fuel used, 2) HHV of fuel, 3) calculated daily emissions for each air contaminant emitted, 4) daily emissions measured by CEMS, 5) and calculated combined annual emissions for NOx and CO. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. This unit shall be fired exclusively on PUC-quality natural gas and the PUC-quality natural gas shall have a total sulfur content of less than or equal to 1.0 gr/100 scf. [40 CFR 60.333(b) and District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
13. The fuel sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, or tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or GAS Processors Association Standard 2377. If the fuel sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the monitoring frequency shall be every 6 months. If any six-month monitoring tests result in a fuel sulfur content exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
14. Except during transitional operation period, emission rates from the gas turbine shall not exceed any of the following: PM10: 2.22 lb/hr, SOx (as SO2): 0.98 lb/hr, NOx (as NO2): 5.0 ppmvd @ 15% O2 and 6.20 lb/hr (based on a 3-hour average), VOC: 2.0 ppmvd @ 15% O2 and 0.88 lb/hr, CO: 12.0 ppmvd @ 15% O2 and 8.07 lb/hr (based on a 3-hour rolling average), or ammonia: 10 ppmvd @ 15% O2 (based on a 1-hour rolling average). [District Rules 2201, 4102, 4301, 4703 and 40 CFR Part 60 Subpart GG] Federally Enforceable Through Title V Permit
15. During transitional operation period, emission rates from the gas turbine shall not exceed any of the following: PM10: 2.22 lb/hr, SOx (as SO2): 0.98 lb/hr, NOx (as NO2): 20 lb/hr (based on a 3-hour rolling average), VOC: 0.88 lb/hr, CO: 8.07 lb/r (based on a 3-hour rolling average), or ammonia: 20 ppmvd @ 15% O2 (based on a 1-hour rolling average). [District Rules 2201, 4102, 4301, 4703 and 40 CFR Part 60 Subpart GG] Federally Enforceable Through Title V Permit
16. Transitional operation period shall be any of the following periods as they are define in Rule 4703: bypass transition period, primary re-ignition period, reduced load period start-up or shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
17. Permittee 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] Federally Enforceable Through Title V Permit
18. In the event of a breakdown of monitoring equipment, the owner shall notify the APCO as soon as reasonably possible, but no later than eight (8) hours after its detection, unless the owner or operator demonstrates to the APCO's satisfaction that a longer reporting period was necessary, and shall initiate repairs. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
19. A violation of emissions standards indicated by the CEM system shall be reported to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
20. 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] Federally Enforceable Through Title V Permit
21. Compliance with the ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 =  $((a-(bxc/1,000,000)) \times 1,000,000/b)$ , where a = ammonia injection rate (lb/hr)/17 lb/lb.mol, b = dry exhaust gas flow rate (lb/hr)/29(lb/lb.mol), and c = change in measure NOx concentration ppmv @ 15% O2 across catalyst. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Compliance testing to measure the PM10, NOx (as NO2), VOC, CO, ammonia emissions, and fuel gas sulfur content of this permit unit shall be conducted at least once every twelve months. [District Rules 2201 and 4703, 6.3 and 40 CFR 60.332 (a), (b) and 40 CFR 60.333] Federally Enforceable Through Title V Permit
23. The following test methods shall be used. PM10: EPA Method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA Method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA Method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 4703, 6.4, and 40 CFR 60.335(b)] 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.

24. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.332(a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
25. Permittee shall comply with all applicable source sampling requirements of District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO<sub>x</sub>, CO, and O<sub>2</sub> analyzer during District inspections. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Compliance demonstration (source testing) shall be District witnessed, or authorized and the samples shall be collected by a California Air Resources Board certified testing laboratory. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days of source testing. [District Rule 1081] Federally Enforceable Through Title V Permit
28. The owner or operator shall install, certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO<sub>x</sub> (before and after the SCR catalyst), CO, and O<sub>2</sub> concentrations. The CEMS shall be capable of monitoring emissions during startups and shutdowns, as well as during normal operating conditions. [40 CFR 50.334(b) and District Rules 1080, 2201, and 4703] Federally Enforceable Through Title V Permit
29. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.334(b)(2) and District Rule 1080] Federally Enforceable Through Title V Permit
30. Results of the CEM system shall be averaged over three hour periods using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NO<sub>x</sub>, EPA Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for O<sub>2</sub>, or all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703 5.1, 6.4] Federally Enforceable Through Title V Permit
31. The NO<sub>x</sub>, CO, and O<sub>2</sub> CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60 Appendix B Performance Specifications 2 and 3. [40 CFR 60.334(b)(1) and District Rule 1080] Federally Enforceable Through Title V Permit
32. 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, calibration, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements. [40 CFR 60.7(b) and District Rule 1080] Federally Enforceable Through Title V Permit
33. Audits of continuous emissions monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
34. The owner/operator shall perform a relative accuracy test (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
35. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. this summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit

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

36. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventative measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period and used to determine compliance with an emissions 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) and District Rule 1080] Federally Enforceable Through Title V Permit
37. The owner or operator shall report periods of excess emissions that are defined as follows: any one-hour period during which the average-water-to-fuel ratio (when the CEMS is not operational and Dry-Low NOx technology is not being used), as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the NOx emission limit. Each report shall include average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. [40 CFR 60.334(c)(1)] Federally Enforceable Through Title V Permit
38. Results of the CEM system 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 California Air Resources Board, and the Environmental Protection Agency. [District Rule 1080, 6.0] Federally Enforceable Through Title V Permit
39. The continuous monitor of fuel, water, and water-to-fuel ratio system shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the NOx emissions limits at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. [40 CFR 60.335(c)(2)] Federally Enforceable Through Title V Permit
40. The minimum ammonia injection rate shall be reported to the District and the injection rate shall be monitored by the operator during CEM breakdowns to demonstrate NOx emission compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
41. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
42. The permittee shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rule 4703, 6.2.4 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
43. The permittee shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, and calculated NOx mass emission rates (lb/hr). [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
44. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-14-11-10

**EXPIRATION DATE:** 08/31/2015

**EQUIPMENT DESCRIPTION:**

55 MW COGENERATION UNIT INCLUDING 45 MW GENERAL ELECTRIC LM-6000PC GAS TURBINE WITH SELECTIVE CATALYTIC REDUCTION AND CO OXIDATION CATALYST, 10 MW STEAM TURBINE, AND HEAT RECOVERY STEAM GENERATOR WITH A HRSG BYPASS STACK

## PERMIT UNIT REQUIREMENTS

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1. The HRSG bypass stack shall only be utilized when the main stack is not utilized (except during transition periods between the stacks) and the HRSG bypass stack shall be subject to all of the same requirements as the main stack at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The owner/operator shall perform an initial relative accuracy test as specified by 40 CFR Part 60 Appendix B to certify the new stack probe in the HRSG bypass stack, and every 720 stack operating hours per 40 CFR Part 75 Appendix B Section 2.3.3 thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit
3. Calibration gas audit linearity checks shall be performed quarterly or every 168 stack operating hours per 40 CFR Part 75 Appendix B Section 2.2.4. [District Rule 1080] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
7. This unit shall be fired exclusively on PUC-quality natural gas and the PUC-quality natural gas shall have a total sulfur content less than or equal to 1.0 gr/100 scf. [40 CFR 60.333(b) and District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
8. The fuel sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If the fuel sulfur content is less than 1.0 gr/100 scf for 8 consecutive weeks, then the monitoring frequency shall be every 6 months. If any six-month monitoring tests result in a fuel sulfur content exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
9. Gas turbine heat input shall not exceed 2,824,250 MMBtu/year based on a 12-month rolling sum. Compliance with this limit shall be determined at the end of each month. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Units subject to the Specific Limiting Condition (SLC) plan are C-14-1, '-2, '-10, '-11, and '-12. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Combined emission rate for all units subject to the SLC plan shall not exceed any of the following: 120.9 lb-PM10/day, 50.9 lb-SOx/day, 209.2 lb-NOx/day, 562.7 lb-CO/day, or 45.7 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The combined annual emissions rates for all units subject to the SLC plan shall not exceed either of the following: 48,539 lb-NOx/year or 199,889 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Gas turbine engine and generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater except for up to three minutes in any hour. [District NSR Rule] Federally Enforceable Through Title V Permit
14. For each unit subject to the SLC, the permittee shall maintain all necessary records in order to show compliance with the daily and annual SLC limits, including (but not limited to) the following: 1) amount of fuel used, 2) HHV of fuel, 3) calculated daily emissions for each air contaminant emitted, and 4) daily emissions measured by CEMS. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emission rate, or Permit to Operate is surrendered or sold. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Except during thermal stabilization, emission rates from the gas turbine shall not exceed any of the following: 2.0 ppmvd NOx @ 15% O2 (based on a 3-hour rolling average), 1.25 lb-SOx/hr, 2.85 lb-PM10/hr, 20 ppmv CO @ 15% O2, 2 ppmv VOC @ 15% O2, or 10 ppmv-ammonia @ 15% O2 (based on a 1-hour rolling average). [40 CFR 60.332, District NSR and District Rules 4703, 5.1 and 5.2 and 4102] Federally Enforceable Through Title V Permit
17. During thermal stabilization, emissions rates from the gas turbine shall not exceed any of the following: 20 lb-NOx/hr (based on a 3-hour rolling average), 1.25 lb-SOx/hr, 2.85 lb-PM10/hr, 19.40 lb-CO/hr (based on a 3-hour rolling average), 1.12 lb-VOC/hr, or 20 ppmv-ammonia @ 15% O2 (based on a 1-hour rolling average). [40 CFR 60.332, District NSR Rule and District Rules 4703, 5.1 and 5.2 and 4102] Federally Enforceable Through Title V Permit
18. Ammonia slip shall be calculated as follows: ammonia slip ppmv @ 15% O2 =  $\{[a-(b \times c/1,000,000)] \times 1,000,000/b\}$ , where a = ammonia injection rate (lb/hr)/17 (lb/lb mol), b = dry exhaust gas flow rate (lb/hr)/29 (lb/lb mol), and c = change in measured NOx concentration ppmv at 15% O2 across the catalyst. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The thermal stabilization period shall be defined as the start up or shut down time during which the exhaust gas is not within the normal operating temperature range, not to exceed two hours. [District Rule 4703, 3.25] Federally Enforceable Through Title V Permit
20. Compliance testing to measure the PM10, NOx (as NO2), VOC, CO, ammonia emissions, and fuel gas sulfur of this permit unit shall be conducted at least once every twelve months. [District Rules 2201, 4703, 6.3, 40 CFR 60.332(a), (b), and 40 CFR 60.333] Federally Enforceable Through Title V Permit
21. The following test methods shall be used. PM10: EPA Method 5 (front half and back half) or EPA Method 201A/202, NOx: EPA Method 7E or 20, CO: EPA Method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA Method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rule 1081; District Rule 4703, 6.4; and 40 CFR 60.335(b)] Federally Enforceable Through Title V Permit
22. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.332(a)(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
23. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [40 CFR 60.335(b)(3) and District Rule 4703] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. For units equipped with CEM, CEM records shall be used in place of calculated emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



27. Permittee 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] Federally Enforceable Through Title V Permit
28. The District shall be notified in writing within 10 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] Federally Enforceable Through Title V Permit
29. The owner or operator shall install, certify, maintain, operate, and quality-assure a Continuous Emissions Monitoring System (CEMS) which continuously measures and records the exhaust gas NO<sub>x</sub> (before and after the SCR catalyst) and O<sub>2</sub> concentrations. The CEMS shall be capable of monitoring emissions during startups and shutdowns, as well as during normal operating conditions. [40 CFR 50.334(b) and District Rules 1080, 2201, and 4703] Federally Enforceable Through Title V Permit
30. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.334(b)(2) and District Rule 1080] Federally Enforceable Through Title V Permit
31. Results of the CEM system shall be averaged over three hour periods using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NO<sub>x</sub>, EPA Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for O<sub>2</sub>, or, if continuous emission monitors are used, all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
32. The NO<sub>x</sub>, CO, and O<sub>2</sub> CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60 Appendix B Performance Specifications 2, 3, and 4A. [40 CFR 60.334(b)(1) and District Rule 1080] Federally Enforceable Through Title V Permit
33. 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, calibration, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements. [40 CFR 60.7(b) and District Rule 1080] Federally Enforceable Through Title V Permit
34. Audits of continuous emissions monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
35. Permittee shall comply with all applicable source sampling requirements of District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
36. The owner/operator shall perform a relative accuracy test (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
37. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. this summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
38. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO<sub>x</sub> emissions, nature and the cause of excess (if known), corrective actions taken and preventative measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period and used to determine compliance with an emissions 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) and District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

39. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Results of the CEM system 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 California Air Resources Board, and the Environmental Protection Agency. [District Rule 1080, 6.0] Federally Enforceable Through Title V Permit
41. In the event of a breakdown of monitoring equipment, the owner shall notify the APCO as soon as reasonably possible, but no later than eight (8) hours after its detection, unless the owner or operator demonstrates to the APCO's satisfaction that a longer reporting period was necessary, and shall initiate repairs. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
42. Permittee shall maintain records of the following: 1) the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the permit unit; 2) performance testing, evaluations, calibrations, checks, adjustments, and maintenance of CEMS; and 3) emission measurements. [District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
43. Permittee shall maintain records of the following: 1) annual hours of operation, 2) daily and annual fuel consumption, 3) daily and annual continuous emission monitor measurements, 4) daily calculated ammonia slip, and 5) daily and annual emission rates. [District Rules 2201 and 4703, 6.2.6] Federally Enforceable Through Title V Permit
44. Permittee shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: 1) time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; 2) 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; 3) applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and 4) the nature of system repairs and adjustments; 5) a negative declaration when no excess emissions occurred. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
45. Permittee shall maintain on file copies of natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
46. A violation of emission standards indicated by the CEM system shall be reported to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
47. The minimum ammonia injection rate shall be reported to the District and the injection rate shall be monitored during CEM breakdowns to demonstrate NOx emission compliance. [District Rule 4703, 6.2.5] Federally Enforceable Through Title V Permit
48. The permittee shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rule 4703, 6.2.4 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
49. The permittee shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, and calculated NOx mass emission rates (lb/hr). [District Rules 2201 and 2529, 9.4.2] Federally Enforceable Through Title V Permit
50. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
51. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) Have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

52. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
53. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
54. The owners and operators of each source and each affected unit at the source shall: (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit
55. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit
56. An affected unit shall be subject to the sulfur dioxide requirements starting on the later of January 1, 2000, or the deadline for monitoring certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3) that is not a substitution or compensating unit. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit
57. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit
58. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit
59. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit
60. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit
61. The owners and operators of each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides. [40 CFR 72] Federally Enforceable Through Title V Permit
62. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
63. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) Pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
64. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit

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

65. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (i) All emissions monitoring information, in accordance with 40 CFR part 75; (ii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iii) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT C

## Detailed Facility List

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**Detailed Facility Report**  
For Facility=14  
Sorted by Facility Name and Permit Number

<b>FRESNO COGENERATION PARTNERS</b> 8105 S LASSEN AVE SAN JOAQUIN, CA 93660	<b>FAC #</b> STATUS: TELEPHONE:	<b>C 14</b> A 2096932494	<b>TYPE:</b> TOXIC ID:	<b>TitleV</b> 40000	<b>EXPIRE ON:</b> AREA: INSP. DATE:	<b>08/31/2015</b> 3/ 05/17
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-14-1-11	1,336 HP ELECTRIC MOTOR RATING	3020-01 G	1	855.00	855.00	D	DORMANT FEED DRYING OPERATION WITH ONE MEC AND ONE GUARANTEED PERFORMANCE ROTARY DRUM DRYER; TWO SCREW FEEDERS; TWO PRE-KNOCKOUT 144" DIAMETER CYCLONES; AND A MULTICLONE WITH TWO CHAMBERS
C-14-2-6	710.7 HP ELECTRIC MOTOR RATING	3020-01 F	1	637.00	637.00	D	HAMMERMILL OPERATION, INCLUDING TWO 200-HP HAMMERMILLS WITH TWO FANS AND PRE-KNOCKOUT CYCLONES AND ONE BAGHOUSE
C-14-3-10	33,000 kW Electrical Generation	3020-08A F	1	8,564.00	8,564.00	D	23 MW PRATT & WHITNEY GAS TURBINE, MODEL #UTC FT4A9 WITH DRY LOW NOX COMBUSTION SYSTEM, AN OPTION TO USE WATER-INJECTION SYSTEM, A CO CATALYST UNIT ON THE TURBINE EXHAUST DUCT FEEDING THE ROTARY DRUM DRYERS AND A 10 MW DUCT BURNER (33 MW TOTAL)
C-14-4-3	136 BHP DIESEL-FIRED IC ENGINE	3020-10 B	1	123.00	123.00	A	136 BHP CUMMINS MODEL #V378F2 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIRE WATER PUMP
C-14-5-3	534 bhp IC engine	3020-10 D	1	502.00	502.00	A	534 HP CATERPILLAR DIESEL IC ENGINE MODEL 3406B POWERING AN EMERGENCY ELECTRICAL GENERATOR
C-14-7-5	30,000 kBtu/hr	3020-02 H	1	1,080.00	1,080.00	D	30.0 MMBTU/HR GORDON-PIATT MODEL LNF20.9-G-400-E110-E 2.30-UL NATURAL GAS-FIRED AUXILIARY DRYER BURNER, WITH LOW NOX BURNER AS HEAT SOURCE FOR ROTARY DRYER PD-1
C-14-10-6	23,000 KW ELECTRICAL GENERATOR	3020-08A F	1	8,564.00	8,564.00	A	23 MW ELECTRICAL GENERATOR POWERED BY A PRATT AND WHITNEY MODEL FT4A9 GAS-FIRED, SIMPLE CYCLE TURBINE ENGINE WITH DRY LOW NOX (DLN) TECHNOLOGY OR WATER INJECTION, A SELECTIVE CATALYTIC REDUCTIONS (SCR) SYSTEM, AN OXIDATION CATALYST, AN INLET AIR EVAPORATIVE COOLER, AND LUBE OIL VENT MIST ELIMINATORS
C-14-11-10	55,000 kW	3020-08B G	1	10,706.00	10,706.00	A	55 MW COGENERATION UNIT INCLUDING 45 MW GENERAL ELECTRIC LM-6000PC GAS TURBINE WITH SELECTIVE CATALYTIC REDUCTION AND CO OXIDATION CATALYST, 10 MW STEAM TURBINE, AND HEAT RECOVERY STEAM GENERATOR WITH A HRSG BYPASS STACK
C-14-12-2	329 BHP IC ENGINE	3020-10 C	1	252.00	252.00	D	DORMANT FULL-TIME 329 BHP NATURAL GAS-FIRED INTERNAL COMBUSTION ENGINE SERVED BY A 3-WAY CATALYST AND AIR-FUEL RATIO CONTROLLER, POWERING AN ELECTRICAL GENERATOR

Number of Facilities Reported: 1

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# ATTACHMENT D

## EPA and CARB Comments and the District's Response

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## COMMENTS AND RESPONSES

### CARB Comment:

On 7/5/2016, Steve Eve (ph: (916) 327-2949) from the California Air Resources Board (CARB) called and commented on a typo found on page 20 of the Proposed Title V Permit Renewal Evaluation. Mr. Eve suggested that the following corrections be made and the District agreed with the comment. The revised renewal evaluation reflects this change.

#### C-14-10-6: 23 MW Electrical Generator

For NO<sub>x</sub> and CO, this permit unit is equipped with continuous emissions monitoring system (CEMS) for criteria air pollutants. Therefore, this permit unit is exempt from the CAM requirements.

For SO<sub>x</sub> and PM<sub>10</sub>, ~~and VOC~~, this unit is not subject to CAM since it does not have any add-on control device for those pollutants.

For VOC, the uncontrolled emission factor from AP-42 Table 3.1-2a (4/00) is:  $2.1 \times 10^{-3}$  lb VOC/MM Btu. The turbine is limited to 1,320,000 MMBtu/year. Uncontrolled emissions are 2,772 lb VOC/yr., which is less than the 20,000 lb VOC /yr. CAM applicability threshold. CAM requirements are not required for VOC emissions.

### EPA Comments:

On 7/27/2016, Laura Yannayon from the Environmental Protection Agency (EPA) submitted the following comment by e-mail:

#### **Comment:**

On page 14 of the Title V Permit Renewal Evaluation, the District evaluates the applicable requirements for 40 CFR 60, Subpart GG – Standard of Performance for Stationary Gas Turbines and specifically compliance with the SO<sub>x</sub> emission concentration limit found in 60.333(a). While EPA does not disagree with the District's determination that the stated permit conditions ensure compliance with this applicable requirement, there are statements in this part of the evaluation which incomplete. This section starts by making a statement that "Natural gas supplies in California (PG&E, SOCal Gas, etc) regulate the quality of the gas as following:", but then no text follows. The next paragraph states that an ARB guidance document has also determined that 1.0 gr S/100 scf is the sulfur content of gas supplied by a utility regulated by the PUC. This section should be updated to state that the PUC regulates the sulfur content of



NG, and that it limits the sulfur content in natural gas to 1.0 gr S/100 scf or less (Mohave Gas is only 0.75 gr S/100 scf). (See PG&E Gas Rule No. 21, pg 16 – attached.) This information should be stated as the basis for using 1.0 gr S/100 scf in the calculations that follow to demonstrate compliance with the requirements of 40 CFR 60.333(a). Please update this section of the evaluation for this project and the District's evaluation templates for sources subject to natural gas sulfur content or emission limits.

**Response:**

To comply with EPA's comment, the District will modify the referenced section on page 14, accordingly:

Compliance with SO<sub>x</sub> Emission Concentration Limit - 60.333(a):

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

~~The California Air Resource Board (ARB), in their document Guidance for Power Plant Siting (Stationary Source Div., 6/99), As referenced in PG&E Gas Rule No. 21 (dated 5/24/2009), also determined that 1.0 gr S/100 scf is the sulfur content of gas supplied by a utility regulated by the Public Utilities Commission (PUC).~~

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