



JAN 27 2017

Mr. Terry Coble
Covanta Stanislaus, Inc.
PO Box 278
Crows Landing, CA 95313

**Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # N-2073
Project # N-1153508**

Dear Mr. Coble:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Covanta Stanislaus, Inc. at Crows Landing, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

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

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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation
Covanta Stanislaus Inc.
N-2073**

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TITLE V PERMIT RENEWAL EVALUATION
Municipal Solid Waste Cogeneration Plant

Engineer: James Harader
Date: December 21, 2016

Facility Number: N-2073
Facility Name: Covanta Stanislaus, Inc.
Mailing Address: PO Box 278
Crows Landing, CA 95313

Contact Name: Terry Coble
Phone: (209) 827-2211

Responsible Official: Jeff Ruoss
Title: Plant Manager

Project # : N-1153508
Deemed Complete: December 15, 2015

I. PROPOSAL

Covanta Stanislaus(hereafter referred to as CSI) was originally issued a Title V permit on April 30, 2003. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

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

In addition, the facility is requesting to incorporate ATC N-2073-4-0 into the Title V permit. ATC N-2073-4-0 was issued for a Tier 3 diesel-fired engine powering a fire pump for emergency purposes, and replaces the fire pump currently permitted under PTO N-2073-2-2.

II. FACILITY LOCATION

This power generation facility is located at 4040 Fink Road in Crows Landing, CA.

III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

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

A. Template SJV-UM-0-3 Facility Wide Umbrella

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella.

V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

The following permit conditions, including their underlying applicable requirements, originate from the 0-3 umbrella template and are not subject to further EPA or public review.

Conditions #1 through #26 and #29 through #40 of the facility wide requirements of the draft TV PTO (N-2073-0-3) were issued under the umbrella template.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

District Rule 2020, Exemptions
(as amended August 18, 2011 → December 18, 2014)

District Rule 2201, District New and Modified Stationary Source Review Rule
(as amended April 21, 2011 → February 18, 2016)

District Rule 4352, Solid Fuel Fired Boilers, Steam Generators and Process Heaters (as amended May 18, 2006 → December 15, 2011)

District Rule 4702, Internal Combustion Engines
(as amended August 8, 2011 → November 14, 2013)

40 CFR 60 Subpart Db, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
(as amended January 28, 2009 → February 27, 2014)

40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air pollutants for Stationary Reciprocating Internal Combustion Engines
(as amended June 30, 2010 → February 27, 2014)

40 CFR 82 Subparts B, Stratospheric Ozone
(as amended June 25, 2013)

40 CFR 82 Subpart F, Stratospheric Ozone
(as amended April 10, 2015)

B. Rules Removed

None

C. Rules Added

District Rule 2410, Prevention of Significant Deterioration
(as amended June 16, 2011)

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

40 CFR 60 Subpart IIII, Standards of Performance for Stationary
Compression Ignition Internal Combust Engines
(as amended July 7, 2016)

D. Rules Not Updated

District Rule 1070, Inspections
(as amended December 17, 1992) – (Non-SIP replacement for Stanislaus
Country Rule 107)

District Rule 1080, Stack Monitoring
(as amended December 17, 1992)

District Rule 1081, Source Sampling
(as amended December 16, 1993)

District Rule 2010, Permits Required
(as amended December 17, 1992)

District Rule 2031, Transfer of Permits
(as amended December 17, 1992)

District Rule 2070, Standards for Granting Applications
(as amended December 17, 1992)

District Rule 2080, Conditional Approval
(as amended December 17, 1992)

District Rule 2520, Federally Mandated Operating Permits
(as amended June 21, 2001)

¹ District Rule 4701 requirements were removed from the Title V permits in the previous renewal, as District Rule 4702 included an exemption from District Rule 4701 requirements at the time of the previous renewal. District Rule 4702 has since been revised and no longer includes an exemption from Rule 4701 requirements. Therefore, District Rule 4701 requirements will be added as part of this TV renewal.

District Rule 4201, Particulate Matter Concentration
(as amended December 17, 1992)

District Rule 4202, Particulate Matter Emissions Rate
(as amended December 17, 1992)

District Rule 4301, Fuel Burning Equipment
(as amended December 17, 1992)

District Rule 4601, Architectural Coatings
(as amended December 17, 2009)

District Rule 4801, Sulfur Compounds
(as amended December 17, 1992)

District Rule 8011, General Requirements
(as amended August 19, 2004)

District Rule 8021, Construction, Demolition, Excavation, Extraction, and
Other Earthmoving Activities (as amended August 19, 2004)

District Rule 8031, Bulk Materials
(as amended August 19, 2004)

District Rule 8041, Carryout and Trackout
(as amended August 19, 2004)

District Rule 8051, Open Areas
(as amended August 19, 2004)

District Rule 8061, Paved and Unpaved Roads
(as amended August 19, 2004)

District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas
(as amended September 16, 2004)

40 CFR 60 Subpart Cb, Emissions Guidelines and Compliance Times for
Large Municipal Solid Waste Combustors that are Constructed on or Before
September 20, 1994 (as amended May 10, 2006)

40 CFR 60 Subpart Ea, Standards of Performance for Municipal Waste Combustors for which Construction is Commenced After December 20, 1989 and on or Before September 20, 1994 (as amended October 17, 2000)²

40 CFR 60 Subpart Eb, Standards of Performance for Large Municipal Waste Combustors for which Construction is Commenced after September 2, 1994 or for which Modification or Reconstruction is Commenced after June 19, 1996 (as amended May 10, 2006)²

40 CFR 61 Subpart M, National Emission Standard for Asbestos
(as amended September 21, 2006)

40 CFR 68, Chemical Accident Prevention Provisions
(as 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

No rules have been added.

B. Rules Not Updated

District Rule 1070, Inspections
(amended December 17, 1992)

District Rule 1100, Equipment Breakdown
(amended December 17, 1992)

District Rule 1160, Emission Statements
(adopted November 18, 1992)

² Covanta Stanislaus combustors were constructed prior to December 20, 1989 and have not been modified or reconstructed since that time. Therefore, Subparts Ea and Eb do not directly apply to the municipal solid waste combustion units at this facility. However, the state plan for 40 CFR 60 Subpart Cb requires the combustors at this site to comply with several of the requirements of Subpart Eb, as described in the facilities previous Title V permit renewal.

District Rule 2040, Applications
(amended December 17, 1992)

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

District Rule 4203, Particulate Matter Emissions from Incineration of Combustible Refuse (as amended December 17, 1992)

17 CCR Section 93115, Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the previous TV Renewal.

A. District Rule 2020 – Exemptions

District Rule 2020 lists source categories that may be exempt from obtaining permits, and specified recordkeeping requirements to verify such exemptions. The amendments to this Rule do not have any effect on the current permit requirements.

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

District Rule 2201 was last amended on February 18, 2016, after this facility's Title V permit was last renewed. This Title V permit renewal does not constitute a modification per section 3.25, defined as an action including at least one of the following items:

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

- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Since this project does not constitute a modification, the updated requirements of this rule are not applicable to this project.

C. District Rule 2401 – Prevention of Significant Deterioration

District Rule 2401 has been adopted since the facility's last Title V renewal. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any PSD permit actions have already been incorporated into the current Title V permit.

D. District Rule 2520 – Federally Mandated Operating Permits

Greenhouse Gas Requirements

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

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

Permit N-2073-1 includes two municipal solid waste fired combustion units that are subject to the requirements of Rule 4352.

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_x) and carbon monoxide (CO) from solid fuel fired boilers, steam generators and process heaters.

Rule 4352 Requirements	Method of Compliance									
<p>Section 5.1 Table 1 includes the following NOx and CO emission limits for municipal solid waste-fired boilers:</p> <table border="1" data-bbox="215 714 1068 1050"> <thead> <tr> <th colspan="3" data-bbox="215 714 1068 768">Rule 4352 Table 1 – NOx and CO Emission Limits</th> </tr> <tr> <th data-bbox="215 768 667 947">Fuel Type</th> <th data-bbox="667 768 873 947">NOx Limit</th> <th data-bbox="873 768 1068 947">CO Limit</th> </tr> </thead> <tbody> <tr> <td data-bbox="215 947 667 1050">Municipal Solid Waste</td> <td data-bbox="667 947 873 1050">165 ppmv corrected to 12% CO₂</td> <td data-bbox="873 947 1068 1050">400 ppmv corrected to 3% O₂</td> </tr> </tbody> </table>	Rule 4352 Table 1 – NOx and CO Emission Limits			Fuel Type	NOx Limit	CO Limit	Municipal Solid Waste	165 ppmv corrected to 12% CO ₂	400 ppmv corrected to 3% O ₂	<p>Source testing indicates that the municipal solid waste combustors are operating in compliance with these limits.</p> <p>Condition #22 of the existing PTO (N-2073-1-14) limits the CO emissions to 100 ppmvd @ 7% O₂, which is equivalent to 42.9 ppmvd @ 3% O₂. Therefore, the current permit condition complies with Rule 4352, and will be included as condition #22 of the draft TV PTO (N-2073-1-16).</p> <p>Condition #102 of the existing PTO (N-2073-1-14) limits the NOx emissions to 165 ppmvd @ 12% CO₂ on a block 24-hour average. Therefore, the current permit condition complies with Rule 4352, and will be included as condition #104 of the draft TV PTO (N-2073-1-16). A Rule 4352 reference has been added to the condition.</p>
Rule 4352 Table 1 – NOx and CO Emission Limits										
Fuel Type	NOx Limit	CO Limit								
Municipal Solid Waste	165 ppmv corrected to 12% CO ₂	400 ppmv corrected to 3% O ₂								
<p>Section 5.2 states that all NOx and CO emission limits shall be based on a block 24-hour average. A violation of the emission limits as measured by the test methods listed in Section 6.3 shall constitute a violation of this Rule.</p>	<p>Condition #22 of the existing PTO (N-2073-1-14) limits CO emissions based on a four hour rolling average, which is more stringent than a block 24-hour average. This condition has been included as condition #22 of the draft TV PTO (N-2073-1-16)</p> <p>Condition #102 of the existing PTO (N-2073-1-14) limits the NOx emissions to 165 ppmvd @ 12% CO₂ on a block 24-hour average. Therefore, the current permit condition complies with Rule 4352, and will be included as condition #104 of the draft TV PTO (N-2073-1-16). A Rule 4352 reference has been added to the condition.</p>									
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Rule 4352 Requirements	Method of Compliance
<p>Section 5.3 states that the emission limits of Section 5.1 do not apply during start-up or shutdown provided an operator complies with the following:</p> <ol style="list-style-type: none"> 1. The duration of each shut down shall not exceed 12 hours; 2. The duration of each start-up shall not exceed 96 hours. 3. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shut down. 	<p>Concition #120 of the current PTO (N-2073-1-14) enforces this requirement. The condition language has been modified to clarify that the exemption from emission limits during start-up and shut down does not apply to emission limitations that are based on other requirements, such as 40 CFR, NSR, or PSD. The revised condition is included as Condition #120 on the draft TV PTO (N-2073-1-16).</p>
<p>Section 5.4 states that the owner/operator of any unit using ammonia injection as a NOx control technique shall operate a Continuous Emissions Monitoring System (CEM) to monitor and record NOx concentrations, CO₂ or O₂ concentrations, as well as the NOx emission rate. The Continuous Emission Monitoring Systems shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7(c) and 60.13. CEMs must also satisfy the Performance Specifications of 40 CFR 60 Appendix B and Relative Accuracy Test Audit of Appendix F.</p>	<p>Conditions #67 and #70 of the current permit (N-2073-1-14) enforce these requirements. These conditions have been retained as conditions #67 and #70 on the draft TV PTO (N-2073-1-16).</p>
<p>Section 6.1.1 lists recordkeeping requirements for all units except for municipal solid waste (MSW) fired units. Section 6.1.2 requires those records to be kept for five years, and made available to the APCO, ARB, and EPA upon request.</p>	<p>Since this project only involves MSW fired units, the requirements of these sections are not applicable.</p>
<p>Section 6.2.1 requires each combustion unit to be tested at least once every 12 months to determine compliance with the NOx and CO emission limits of the Rule.</p>	<p>Condition #78 of the current PTO (N-2073-1-14) enforces this requirement. The condition has been included on the draft TV PTO (N-2073-1-16), as condition #78, and a rule 4352 reference has been added to the condition.</p>
<p>Section 6.2.2 requires that all emission measurements be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate</p>	<p>Condition #79 of the draft TV PTO (N-2073-1-16) has been added to enforce this requirement.</p>
<p>Section 6.2.3 requires that no compliance determination be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 3 minutes or longer.</p>	<p>Condition #80 of the draft TV PTO (N-2073-1-16) has been added to enforce this requirement.</p>
<p>Section 6.3 requires the following test methods be utilized for compliance with the emission limits of Section 5.0:</p> <ul style="list-style-type: none"> • Oxides of Nitrogen – EPA Method 7E or ARB Method 100 • Carbon Monoxide – EPA Method 10 or ARB Method 100 • Stack gas oxygen – EPA Method 3 or 3A or ARB Method 100 • Stack Gas Velocities – EPA Method 2 	<p>Conditions #22 and #23 of the current PTO (N-2073-1-14) enforce these requirements. These conditions have been retained on the draft TV PTO (N-2073-1-16) as conditions #22 and #23.</p>

F. District Rule 4701 – Internal Combustion Engines – Phase 1

This facility operates one diesel-fired emergency engine that powers a fire pump (N-4703-4). Pursuant to Section 4.2.2 of Rule 4701, engines used exclusively for firefighting services and flood control are exempt from the requirements of District Rule 4701 except for Sections 6.1, 6.2.2, and 6.2.3.

Section 6.1 requires the permittee to submit an emission control plan for existing engines pursuant to the compliance schedule in Section 7.5 of Rule 4701. The requirements of District Rule 4701 were included on the ATC at the time of installation and compliance was determined during the permitting process; therefore an emission control plan was not required for the new engine and this requirement does not apply.

Section 6.2.2 requires the owner/operator to keep the following annual records:

- Total hours of operation,
- The type and quantity (cubic feet or gallons of liquid) of fuel used,
- The purpose for operating the engine,
- For standby engines, all hours of non-emergency and emergency operation shall be reported, and
- Other support documentation necessary to demonstrate a claim to the exemption.

Conditions #10 and #11 of ATC N-2073-4-0 enforce this requirement, and have been included as conditions #10 and #11 of the draft TV PTO (N-2073-4-1). District Rule 4701 has been added as a rule reference for these conditions.

Section 6.2.3 requires that all records be kept for a period of at least five years, shall be readily available, and be made available to the APCO upon request.

Condition #12 of ATC N-2073-4-0 enforces this requirement, and has been included as condition #12 of the draft TV PTO (N-2073-4-1). District Rule 4701 has been added as a rule reference for this condition.

G. District Rule 4702 – Internal Combustion Engines

This facility operates one diesel-fired emergency engine that powers a fire pump (N-4703-4). Pursuant to Section 4.3.1, an engine that meets the following conditions is exempt from the requirements of Rule 4702, except the administrative requirements of Section 6.2.3.

- 4.3.1.1: The engine is operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood; and
- 4.3.1.2: Except for operations associated with Section 4.3.1.1, the engine is limited to operate no more than 100 hours per calendar year as determined by an operable non-resettable elapsed time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine; and
- The engine is operated with an operational nonresettable elapsed time meter.

Conditions #3 and #9 of ATC N-2073-4-0 enforce these requirements. These conditions have been retained as conditions #3 and #9 of the draft TV PTO (N-2073-4-1).

Section 6.2.3 requires the following records be kept for a period of five years:

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

Conditions #10, #11, and #12 of ATC N-2073-4-0 enforce this requirement, and have been included as conditions #10, #11, and #12 of the draft TV PTO (N-2073-4-1).

H. 40 CFR 60 Subpart Db – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

This rule is applicable to steam generating units that have a heat input capacity from fuels combusted of greater than 29 megawatts (100 million MMBtu/hr). Pursuant to the original applications for the municipal solid waste-fired boilers, the units each have a heat input rating greater than 100 MMBtu/hr. However, section 60.40b(k) of Subpart Db states that any affected facility that meets the applicability requirements and is subject to an EPA approved State or Federal Section 111(d)/129 plan implementing Subpart Cb or Subpart BBBB of this part is not covered by this Subpart. The municipal solid waste-fired boilers are subject to an approved State Plan implementing Subpart Cb; therefore, this exemption is applicable and the requirements of 40 CFR 60 Subpart Db are not applicable to these units.

I. 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This facility has one Tier 3 diesel-fired engine that powers a fire pump and was manufactured after July 1, 2006. Pursuant to Section 40 CFR 60.4200(a)(2)(ii), this engine is subject to the requirements of Subpart IIII.

40 CFR 60 Subpart IIII Requirement	Method of Compliance
<p>40 CFR 60.4205(c) states that the owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in Table 4 of this subpart for all pollutants. Pursuant to Table 4 of the subpart, the following emission standards are applicable to the 175 BHP IC engine, which was manufactured after 2009:</p> <p>NMHC + NOx: 3.0 g/bhp-hr PM: 0.15 g/bhp-hr</p>	<p>Conditions #5 and #6 of ATC N-2073-4-0 enforce this requirement. These conditions have been included on the draft TV PTO (N-2073-4-1) as conditions #5 and #6.</p>
<p>40 CFR 60.4207(b) requires the engine to use fuel that meets the requirements of 40 CFR 80.510(b). Section 80.510(b) requires the use of diesel fuel that meets the following standards:</p> <ol style="list-style-type: none"> 1. Sulfur content of 15 ppm for NR diesel fuel or 500 ppm for LM diesel fuel. 2. A minimum Centane index of 40 or a maximum aromatic content of 35 volume percent 	<p>The use of California reformulated diesel fuel ensures compliance with this requirement. Condition #4 of ATC N-2073-4-0 requires the use of CARB certified diesel fuel. This condition is included on the draft TV PTO (N-2073-4-1) as condition #4.</p>
<p>40 CFR 60.4209(a) requires the operator to install and operate a non-resettable hour meter prior to operation of the engine.</p> <p>60 CFR 60.4209(b) requires engines equipped with diesel particulate filters to install a backpressure monitor.</p>	<p>The engine is not equipped with a diesel particulate filter. Condition #3 of ATC N-2073-4-0 enforces the requirement to install a non-resettable hour meter. This condition is included on the draft TV PTO (N-2073-4-1) as condition #3.</p>
<p>40 CFR 60.4211(a) states that the owner/operator must:</p> <ol style="list-style-type: none"> 1. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission related written instructions; 2. Change only those emission related settings that are permitted by the manufacturer; and 3. Meet the requirements of 40 CFR Parts 89, 94, and/or 1068 as they apply. 	<p>Condition #7 of ATC N-2073-4-0 enforces this requirement. This condition has been included on the draft TV PTO (N-2073-4-1) as condition #7.</p>
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40 CFR 60.4211(c) requires the owner or operator to install an EPA certified engine.	The applicant has installed an EPA Tier 3 Certified engine meeting the emission standards; therefore, compliance is expected.
40 CFR 60.4211(f) requires engines to not exceed 100 hours of operation per calendar year for maintenance checks and readiness testing and do not limit emergency operation of the engine powering a fire pump.	Condition #9 of ATC N-2073-4-0 enforces this requirement. This condition has been included on the draft TV PTO (N-2073-4-1) as condition #9.
40 CFR 60.4214(b) requires the owner and operator keep records of emergency and non-emergency usage of the engine, recorded through the non-resettable hour meter, and the reason the engine was in operation.	Conditions #10 and #12 of ATC N-2073-4-0 enforce this requirement. This conditions have been included on the draft TV PTO (N-2073-4-1) as conditions #10 and #12.

J. 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air pollutants for Stationary Reciprocating Internal Combustion Engines

The facility has one 175 bhp diesel-fired emergency IC engine powering a fire pump that is subject to the requirements of Subpart ZZZZ and is considered a "new stationary Reciprocating Internal Combustion Engine (RICE)" for Subpart ZZZZ purposes.

Pursuant to 40 CFR 63.6590(c), engines that fall within the following categories must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII. No further requirements of Subpart ZZZZ are subject to engines in these categories.

- A new or reconstructed stationary RICE
- A new or reconstructed 2 stroke lean burn (2SLB) stationary RICE with a site rating of less than or equal to 500 bhp located at a Major Source of HAP emissions
- A new or reconstructed 4 stroke lean burn (4SLB) stationary RICE with a site rating of less than 250 BHP located at a Major Source of HAP emissions
- A new or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 BHP located at a Major Source of HAP emissions
- A new or reconstructed stationary RICE with a site rating of less than or equal to 500 BHP located at a Major Source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis

- A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 BHP located at a Major Source of HAP emissions
- A new or reconstructed compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 BHP located at a Major Source of HAP emissions.

The new 175 BHP emergency stationary engine falls within the above categories; therefore, Subpart ZZZZ requires compliance with Subpart IIII requirements. Conditions #3, #4, #5, #6, #7, #9, #10, and #12 of the draft TV PTO (N-2073-1-16) enforces the Subpart IIII requirements. Subpart ZZZZ rule references have been added to these conditions to enforce Subpart ZZZZ's requirement to comply with Subpart IIII.

K. 40 CFR Part 82, Subparts B and F, Servicing of Motor Vehicle Air Conditioners and Recycling and emissions Reduction

The requirements from Title VI of the CAA (Stratospheric Ozone) are applicable to all sources. The requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance recharging or disposal of motor vehicle air conditioners (MVAC). These requirements are enforced by conditions #27 and 28 of draft Title V PTO (N-2073-0-3)

L. 40 CFR Part 64 – CAM

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

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

The following Major Source thresholds will be used, as necessary, to determine whether CAM is triggered.

Pollutant	lb/year	ton/year
NOx	20,000	10
SOx	140,000	70
PM10	140,000	70
CO	200,000	100
VOC	20,000	10

N-2073-1-16: Municipal Solid Waste Combustion Units

The municipal solid waste combustion units include emission limits for each criteria pollutant. The unit has the following add-on controls for the control of the above listed pollutants:

1. Ammonia injection for the control of NO_x emissions
2. A baghouse for the control of Particulate matter emissions
3. A lime slurry injection system for the control of SO_x emissions.

Therefore, CAM may only be triggered for NO, SO_x, and PM₁₀.

Pursuant to 40 CFR 64.2(b)(vi):

Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1. The exemption provided in this paragraph (b)(1)(vi) shall not apply if the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device (such as a surface coating line controlled by an incinerator for which continuous compliance is determined by calculating emissions on the basis of coating records and an assumed control device efficiency factor based on an initial performance test; in this example, this part would apply to the control device and capture system, but not to the remaining elements of the coating line, such as raw material usage).

The municipal solid waste combustors are equipped with CEMs systems that measure continuous compliance with the NO_x and SO_x emissions from the combustors without any assumed control device emission reduction factors. Therefore, the municipal solid waste combustors are exempt from the requirements of CAM for NO_x and SO_x.

The units are subject to CAM requirements for PM₁₀ emissions. CAM requirements for PM₁₀ emissions were addressed in the previous TV renewal and the applicant is not proposing to change any of the current CAM requirements for PM₁₀ emissions; nor have any modifications occurred to the units which would necessitate a reconsideration of the CAM requirements. Conditions #2, #21, #38, #68, #117, #118, #119, #120, #121, #123, #124, #125, and #126 enforce the CAM requirements for PM₁₀.

N-2073-4-1: Emergency Engine Powering a Fire Pump

This unit is not equipped with any add-on controls; therefore, the unit is not subject to any CAM 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 following permit shields were issued via the 0-3 umbrella template:

N-2073-0-3, Condition 39: Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Stanislaus County Rules 110, 202, and 401. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

N-2073-0-3, Condition 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]

B. Requirements not Addressed by Model General Permit Templates

The applicant requested the following permit shields. The Clean Air Act allows for a permit shield to be granted if:

- The permit includes the applicable requirements of such provisions; or
- The permitting authority in acting on the permit application makes a determination relating to the permittee that such other provisions are not applicable and the permit includes the determination or a concise summary thereof.

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	Federal Test Methods	Certain performance test methods are based on California Air Resources Board (CARB) Test Methods for Determination of Compliance with State and Local emission limits that may not have a corresponding approved EPA Federal test method.	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	Regulations or Portions Thereof Not Explicitly Listed in this Title V Application	These regulations are only applicable upon an action initiated by CSI; otherwise, they are administratively acknowledged.	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	Regulations or Portions Thereof Not Explicitly Listed in this Title V Application	Regulations for which require an action by the "Administrator", "Administrating Agency", "EPA", or any other government agency are requirements applying to the government agency and not requirements applies to the CSI facility.	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	40 CFR Appendix A- Test Methods 40 CFR Appendix B – Performance Specifications; Appendix F	CSI is deemed to be in compliance with all requirements under 40 CFR Appendix A, B, and F by way of submittal of this Title V Renewal Application	N	The permit allows the use of test methods under 40 CFR Appendix A and requires the use of Appendix B and Appendix F performance specifications for the installed CEMs. Therefore, the source is not exempt from these requirements. The provided basis, "submittal of the Title V Renewal Application" isn't sufficient to demonstrate compliance with all the requirements of these regulations; therefore a Permit shield was not granted.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	40 CFR Part 70 State Operating Permit Programs	CSI is deemed to be in compliance with all applicable requirements under 40 CFR Part 70 by way of submittal of this Title V Renewal Application and by Compliance with SJVAPCD Rule 2520	N	40 CFR Part 70 and District Rule 2520 certainly apply to this facility; therefore, the facility is not exempt from such requirements. Submittal of the TV renewal application does not satisfy all the requirements of 40 CFR Part 70 and District Rule 2520, nor are all of the specific requirements of these rules included on the Title V permit; therefore, a permit shield has not been granted.
All Sources	40 CFR Part 82 Protection of Stratospheric Ozone Subparts A through F	Current Permit Shield on current PTO	Y	The current permit shield is not obsolete and the permit shield will continue to be included on the proposed TV permit. See Condition #46 of draft TV PTO N-2073-0-3.
Boilers/ Combustors	40 CFR 60 Subpart Db – Standards of Performance for Industrial, Commercial, Institutional steam generating units	As long as 40 CFR Subpart E is applicable to this facility, CSI is then subject only to the particulate matter standards under 40 CFR 60 Subpart Db [40 CFR 60.40b(d)].	Y	As stated earlier in this evaluation, Subpart Db is not applicable since the facility meets the applicability requirements and is subject to an EPA approved State Section 111(d)/129 plan implementing Subpart Cb. A permit shield has been granted for the boilers/combustors on this basis. See Condition #127 of draft TV PTO N-2073-1-16.
Boilers/ Combustors	40 CFR 60 Subpart Dc - Standards of Performance for small Industrial, Commercial, and Institutional steam generating units	The CSI facility was constructed prior to June 19, 1989 – Therefore, this federal regulation is not applicable.	Y	Each of the municipal solid waste fired combustors is rated at greater than 100 MMBtu/hr; therefore, Subpart Dc does not apply to the combustors and a permit shield has been granted. See Condition #128 of draft TV PTO N-2073-1-16.
Boilers/ Combustors	40 CFR 60 Subpart Ea – Standards of Performance for Municipal Waste Combustors	The CSI Facility was constructed prior to December 20, 1989 – Therefore, this federal regulation is not applicable except for sections 40 CFR 60.56(a), 60.58(a) and 60.59(a) as referenced by 40 CFR 60 Subpart Ca.	N	This regulation is also applicable to units that were modified or reconstructed after December 20, 1989 and on or before June 19, 1996. The provided basis isn't sufficient to demonstrate that a modification did not occur during this time period. Therefore, the permit shield hasn't been granted.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
Boilers/ Combustors	40 CFR 60 Subpart Eb – Standards of Performance for Municipal Waste Combustors	The CSI facility was constructed prior to September 20, 1994; therefore, this Federal regulation is not applicable.	N	Subpart Eb requirements are also applicable to units that have been modified or reconstructed after June 19, 1996. The provided basis isn't sufficient to demonstrate that a modification did not occur during this time period. Therefore, the permit shield hasn't been granted.
All Sources	40 CFR 60	Applicable Federal Requirements that are equivalent to or less stringent than contained in this Title V application are assumed to be complied with. [Reference: Martin Keast of the SJVUAPCD, March 5, 1997]	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	40 CFR 60	The notification requirements listed in various 40 CFR 60 Subparts concerning facility startup and initial installation of monitoring systems have been complied with. [Reference: Martin Keast of the SJVUAPCD, March 5, 1997]	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	40 CFR 60	CSI met the requirements for initial compliance testing and monitoring referenced in various applicable 40 CFR 60 Subparts. CSI has demonstrated compliance by the acceptance of the facility acceptance tests report for tests conducted in December 1988 and January 1989. [Reference: Martin Keast of the SJVUAPCD, March 5, 1997]	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	Proposition 65 as referenced in the California Code of Regulations, Title 22, Chapter 3 – Safe Drinking Water and Enforcement Act of 1986	Any mandates or requirements under California's Proposition 65 is State Only	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
All Sources	AB2588 (Air Toxics Hot Spots) as referenced in the California Health and Safety Code – Division 26, Part 6 Chapters 1 through 6 and in the California Code of Regulations, Title 17, Division 3, Subchapter 6	Any mandates or requirements under California's AB 2588 "Air Toxics hot Spots" law is state only.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
All Sources	SB1730 (Amendment to Air Toxic Hot Spots Law) As referenced in the California Health and Safety Code- Division 26, Chapters 1 through 6 and in the California Code of Regulations Title 17, Division 3 Subchapter 7.6	Any mandates or requirements under California's AB 2588 "Air Toxics hot Spots" law is state only.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
All Sources	SB1889 as signed into regulation in 1988. This law is currently referenced in the California Health and Safety Code (25531).	Any mandates or requirements under California's SB1889 law is state only. CSI does have an RMP for anhydrous ammonia.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
Motor Vehicles	SJVAPCD Reg. II, Rule 2020, Item 4.2.5	All motor vehicles as defined by the vehicle code of California are exempt from having to obtain air quality permits	N	District Rule 2020 does not list applicable requirements; rather, District Rule 2020 lists sources that are exempt from the requirement to obtain a District permit. Since District Rule 2020 does not list applicable requirements, a permit shield is not necessary for the sections of District Rule 2020.
Drums and Totes	SJVAPCD Reg II, Rule 2020, Item 5.7	All drums and totes are for temporary storage and dispensing and are not emission sources.	N	District Rule 2020 does not list applicable requirements; rather, District Rule 2020 lists sources that are exempt from the requirement to obtain a District permit. Since District Rule 2020 does not list applicable requirements, a permit shield is not necessary for the sections of District Rule 2020.
Storage Tanks	SJVAPCD Reg II., Rule 2020, item 5.7	Storage tanks at the CSI facility meeting the exemption provisions under SJVAPCD Reg. II. Rule 2020, Sec 5.7 would not need to obtain permits nor require recordkeeping or reporting	N	District Rule 2020 does not list applicable requirements; rather, District Rule 2020 lists sources that are exempt from the requirement to obtain a District permit. Since District Rule 2020 does not list applicable requirements, a permit shield is not necessary for the sections of District Rule 2020.
All Sources	SJVAPCD Reg. II, Rule 2201	The regulation is not applicable to the CSI Facility because it does not have or meet the definition of modifications pursuant to item 3.20 and the facility was in operation prior to the promulgation of this Rule.	N	Per EPA Guidance ³ , the provided basis isn't adequate to grant a Permit Shield for District Rule 2201 requirements.
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³ <https://www.epa.gov/sites/production/files/2015-08/documents/pgtnsr.pdf>

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	SJVAPCD Reg. II, Rule 2250	This rule is not applicable since CSI does not operate portable equipment as defined in this Rule	N	A permit shield has not been granted, for the same reason that the request for a District Rule 2201 permit shield was not granted.
All Sources	SJVAPCD Reg. II, Rule 2280	This rule is not applicable since CSI does not operate portable equipment as defined in the Rule	N	A permit shield has not been granted, for the same reason that the request for a District Rule 2201 permit shield was not granted.
All Sources	SJVAPCD Reg. II, Rule 2520	Compliance with this rule (as are applicable to CSI) is by way of this Title V Renewal Application Submittal	N	The requirement to submit a TV renewal is only one component of compliance with District Rule 2520 requirements; furthermore, that requirement is periodic and the submittal of the current Title V renewal does not ensure future compliance with the Rule requirement. Therefore a permit shield has not been granted for this request.
All Sources	SJVAPCD Reg. II, Rule 2530	This rule is not applicable since CSI is not opting to take federally mandated enforceable emission limits	N	The District does not grant permit shields for District Rule 2530 requirements; therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. II, Rule 2540	CSI is exempt from this regulation because the sources are not regulated under Part 72, Title 40 CFR	N	The District does not grant permit shields for Acid Rain requirements; therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. II, Rule 2550	This rule is not applicable since CSI has not applied to construct or reconstruct a Major Air Toxics source as defined in Rule	N	The provided basis doesn't demonstrate conclusively that the facility is not a Major Toxics Source; therefore a permit shield has not been granted.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	SJVAPCD Reg. II, Rule 4001 – New Source Performance Standards	Compliance with this rule is by way of compliance with all applicable federal regulations identified in this permit application submittal.	N	District Rule 4001 references multiple Subparts of 40 CFR 60, as in effect on April 14, 1999. Since the District does not issue blanket permit shields and this rule references multiple subparts, a permit shields has not been granted.
All Sources	SJVAPCD Reg. II, Rule 4002 – National Emission Standards for Hazardous Air Pollutants	Federal Regulations (40 CFR 61) that are incorporated by reference are not applicable to the CSI facility because the facility does not meet the definitions contained in these regulations.	N	District Rule 4002 references multiple Subparts of 40 CFR 63, as in effect on May 20, 2004. Since the District does not issue blanket permit shields and this rule references multiple subparts, a permit shields has not been granted.
All Sources	SJVAPCD Reg. IV, Rule 4105	CSI is exempt from this regulation because the sources do not meet the definition of a disposal facility contained in this Rule	N	The basis provided by the applicant does not provide enough detail to make a conclusive determination that District Rule 4105 is not applicable. Therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. IV, Rule 4106	CSI is exempt from this regulation because the sources do not meet the definition for conducting prescribed burning.	Y	The CSI facility is exempt from this regulations since they do not perform prescribed burning and hazard reduction burning in a wildland or urban interface. Therefore, a permit shield has been granted. See condition #47 of Draft TV PTO N-2073-0-3.
All Sources	SJVAPCD Reg. IV, Rule 4204	CSI is exempt from this regulation because the sources don't meet the definition of operating a cotton gin	Y	CSI does not own/operate a cotton ginning facility; therefore, District Rule 4204 requirements do not apply to this facility and a permit shield has been granted. See condition #48 of Draft TV PTO N-2073-0-3.
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