



SEP 12 2018

Mr. Andrew C. Robertson  
Wellhead Power Panoche, LLC.  
650 Bercut Dr Ste C  
Sacramento, CA 95811

**Re: Notice of Preliminary Decision – Title V Permit Renewal**  
**Facility Number: C-3844**  
**Project Number: C-1171376**

Dear Mr. Robertson:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Wellhead Power Panoche, LLC. at 43649 W Panoche Rd, Firebaugh, 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. Errol Villegas, Permit Services Manager, at (559) 230-5900.

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

**Samir Sheikh**  
Executive Director/Air Pollution Control Officer

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# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation  
Wellhead Power Panoche, LLC.  
C-3844

## TABLE OF CONTENTS

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I.	PROPOSAL .....	2
II.	FACILITY LOCATION.....	3
III.	EQUIPMENT LISTING.....	3
IV.	GENERAL PERMIT TEMPLATE USAGE.....	3
V.	SCOPE OF EPA AND PUBLIC REVIEW.....	3
VI.	FEDERALLY ENFORCEABLE REQUIREMENTS.....	3
VII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE .....	6
VIII.	PERMIT REQUIREMENTS.....	7
IX.	PERMIT SHIELD .....	16
X.	CALIFORNIA ENVIRONMENTAL QUALITY ACT .....	17
XI.	PERMIT CONDITIONS.....	17
XII.	ATTACHMENTS .....	17
A.	DRAFT RENEWED TITLE V OPERATING PERMIT	
B.	PREVIOUS TITLE V OPERATING PERMIT	
C.	DETAILED FACILITY LIST	

**TITLE V PERMIT RENEWAL EVALUATION**  
**ELECTRICITY GENERATING FACILITY**

**Engineer:** Carlos Garcia  
**Date:** September 6, 2018

**Facility Number:** C-3844  
**Facility Name:** Wellhead Power Panoche, LLC.  
**Mailing Address:** 650 Bercut Dr Ste C  
Sacramento, CA 95811

**Contact Name:** Andrew C. Robertson  
**Phone:** (559) 693-2494

**Responsible Official:** Paul Cummins  
**Title:** Plant Manager

**Project # :** C-1171376  
**Deemed Complete:** May 11, 2017

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**I. PROPOSAL**

The Title V permit for Wellhead Power Panoche, LLC. (Wellhead) was issued on November 30, 2012. As required by District Rule 2520, the applicant has applied to renew their Title V permit. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since 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.

## II. FACILITY LOCATION

Wellhead Power Panoche, LLC. is located at 43649 W Panoche Rd, Firebaugh, Fresno County, CA.

## III. EQUIPMENT LISTING

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

## IV. GENERAL PERMIT TEMPLATE USAGE

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

## V. SCOPE OF EPA AND PUBLIC REVIEW

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

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated and Evaluated For Title V Renewal

- District Rule 2020, Exemptions (amended December 20, 2007 ⇒ amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended April 21, 2011 ⇒ amended February 18, 2016)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4702, Internal Combustion Engines (amended August 18, 2011 ⇒ amended November 14, 2013)
- 40 CFR 60, Subpart GG - Standards for Performance of Stationary Gas Turbine (amended February 24, 2006 ⇒ amended February 27, 2014)

- 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (adopted July 11, 2006 ⇒ amended July 7, 2016)
- 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (adopted January 18, 2008 ⇒ amended August 30, 2016)
- 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (adopted January 18, 2008 ⇒ amended February 27, 2014)
- 40 CFR Part 64, Compliance Assurance Monitoring (adopted October 22, 1997)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended June 18, 2008 ⇒ amended June 25, 2013)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction (amended June 18, 2008 ⇒ amended December 27, 2017)

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

No rules have been removed.

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

- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011)

#### **D. Rules Not Updated**

- 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 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 4101, Visible Emissions (amended February 17, 2005)
- 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 (amended December 17, 1992)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 4701, Internal Combustion Engines — Phase 1 (amended August 21, 2003)
- District Rule 4703, Stationary Gas Turbines (adopted 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 Areas (amended September 16, 2004)

- 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines (amended March 20, 2009)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (amended July 20, 2004)
- 40 CFR Part 63, Subpart YYYY, National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (amended April 20, 2006)
- 40 CFR Part 72, Acid Rain Program (amended April 28, 2006)

## 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:

### Rules Not Updated

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 4102, Nuisance (amended December 17, 1992)
- Title 17 California Code of Regulations (CCR), Section 93115, Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines (amended May 19, 2011)

## VIII. PERMIT REQUIREMENTS

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

### A. District Rule 2020 - Exemptions

District Rule 2020 lists emissions units that are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any effect 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 3.25, 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.

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

### C. District Rule 2410 Prevention of Significant Deterioration

The facility is listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). As a result, the PSD Major Source threshold is 100 tpy for any regulated NSR pollutant.



District Rule 2410 was adopted at the time the initial Title V permit for this facility was issued. However, the requirements of Rule 2410 were not addressed during the initial Title V evaluation. Thus, Rule 2410 will be evaluated at this time.

Rule 2410 requirements are only triggered at the time the source undergoes a modification. The requirements of this rule cannot be triggered by the singular renewal of a Title V permit, since permit renewal does not involve any construction or modification of the stationary source. Therefore, the newly adopted requirements of this rule are not applicable at this time.

Additionally, the facility is not an existing PSD major source for any regulated NSR pollutant emitted at this facility. The potential to emit for the facility does not exceed any PSD major source threshold. Therefore, Rule 2410 is not applicable to this facility and no further analysis is required.

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

No changes to this rule have occurred since issuance of the TV permit; however, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

**Greenhouse Gas Discussion**

There are no federally applicable 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 4702 - Internal Combustion Engines**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. This rule applies to any internal combustion engine with a rated brake horsepower greater than 25 horsepower.

In the latest amendments to this rule, the rule was administratively amended to clarify language regarding rule requirements and minimize potential confusion with affected sources. Additionally, the District updated the existing rule language to express the intended emissions limitations for waste gas fueled engines. The amendments did not change existing emissions limitations or result in any detrimental impact on air quality.

Therefore, the amendments to Rule 4702 do not change requirements outlined in permit unit conditions of:

C-3844-3-2: 440 BHP CATERPILLAR MODEL 3406 TA DIESEL-FIRED LOW USE IC ENGINE POWERING A COMPRESSOR TO START THE GAS TURBINES (C-3844-1)

- Conditions 3, 5, 9, and 10 on the proposed permit assure compliance with the requirements of Rule 4702.

C-3844-5-3: 329 BHP CAT MODEL #G379 RICH-BURN NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR AND SERVED BY A 3-WAY CATALYST

- Conditions 8, 11, 12, 13, 15, 16, 17, 18, 19, 20, 23, 24, and 25 on the proposed permit assure compliance with the requirements of Rule 4702.

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

Subsequent to the last Title V renewal for this facility, Subpart GG was amended to only address technical and editorial corrections for source testing of emissions and operations.

In subpart GG, the definitions of terms for the equation in Section 60.335(b)(I) were revised to allow the reference combustor inlet absolute pressure to be measured in millimeters of mercury (mm Hg). The site barometric pressure is allowed as an alternative to the observed combustor inlet absolute pressure for calculating the mean NOX emission concentration.

Subpart GG was last amended by revising the terms  $P_r$  and  $P_o$  for the equation in paragraph (b)(1) to read as follows:

Subpart GG--[Amended]  
Sec. 60.335(b)(1)

- $P_r$  = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure. Alternatively, you may use 760 mm Hg (29.92 in Hg)
- $P_o$  = observed combustor inlet absolute pressure at test, mm Hg. Alternatively, you may use the barometric pressure for the date of the test

Therefore, the amendments to Subpart GG do not change requirements outlined in permit unit conditions of C-3844-1-9.

C-3844-1-9: 49.9 MW NOMINALLY RATED SIMPLE-CYCLE PEAK-DEMAND ELECTRICAL POWER GENERATING SYSTEM CONSISTING OF TWO 25.0 MW PRATT & WHITNEY MODEL #FT4C1 NATURAL GAS-FIRED (TWINPAC CONFIGURATION) GAS TURBINE ENGINES (GTE) WITH DRY LOW NOX (DLN) OR WATER INJECTION TECHNOLOGY, A SHARED SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH OXIDATION CATALYSTS AND INLET AIR FOGGING

- Conditions 5, 6, 10, 15, 16, 19, 21, 22, 25, 29, through 31 on the proposed permit assure compliance with the requirements of 40 CFR Subpart GG.

**G. 40 CFR Part 60 Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

C-3844-3-2: 440 HP CATERPILLAR MODEL 3406 TA DIESEL-FIRED LOW USE IC ENGINE POWERING A COMPRESSOR TO START THE GAS TURBINES (C-3844-1)

Section 60.4200 states that the provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in paragraphs (a)(1) through (4) of this section. Sections (a)(1) through (4) specify the following:

Section (a)(1) applies to manufacturers of engines. This facility does not manufacture engines. Therefore, the requirements of this section are not applicable.

Section (a)(2) specifies requirements for owners and operators of stationary CI ICE that commenced construction after July 11, 2005 and manufactured after April 1, 2006 (and are not fire pump engines). Permit unit -3-1 was installed in 2007, however it was manufactured in 1997. Therefore, the requirements of this section are not applicable.

Section (a)(3) states that owners and operators of stationary CI ICE that are modified or reconstructed after July 11, 2005, and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005. The engine has not been modified or reconstructed since its installation in 2007. Therefore, the requirements of this section are not applicable.

Section (a)(4) states that the provisions of Section 60.4208 of this subpart are applicable to all owners or operators of stationary CI ICE that commenced construction after July 11, 2005. The ATC for unit -3 was issued in September 2004. Since the commence construction date is the date the engine was ordered by the facility, it will be assumed that the facility ordered the engine shortly after receiving their ATC. Therefore, the engine commenced construction before July 11, 2005 and the requirements of Section 60.4208 are not applicable.

**H. 40 CFR Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignited Internal Combustion Engines**

Section 60.4230 states that the provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (6) of this section.

**C-3844-5-3: 329 BHP CAT MODEL #G379 RICH-BURN NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR AND SERVED BY A 3-WAY CATALYST**

This facility operates one spark ignited natural gas-fired IC engine (SC ICE) under permit C-3844-5.

Sections (a)(1) through (a)(3) apply to manufacturers of engines. This facility does not manufacture engines. Therefore, the requirements of these sections are not applicable.

Section (a)(4) states that owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:

- (i) On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 HP (except lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP); or
- (ii) On or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1350 HP; or
- (iii) On or after July 1, 2008, for engines with a maximum engine power less than 500 HP; or
- (iv) On or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 KW (25 HP).

This facility operates one SI ICE engine under permit C-3844-5. The engine was installed prior to June 12, 2006. Therefore, the SI ICE operated at this facility does not meet any of the applicability requirements specified above and the requirements of this section are not applicable.

Section (a)(5) states that owners and operators of stationary SI ICE that are modified or reconstructed after June 12, 2006, and any person that modifies or reconstructs any stationary SI ICE after June 12, 2006. As discussed above, the engine was installed at this facility prior to June 12, 2006 and has not been modified or reconstructed since installation. Therefore, the requirements of this section are not applicable.

Section (a)(6) states that the provisions of Section 60.4236 of this subpart are applicable to all owners or operators of stationary SI ICE that commence construction after June 12, 2006. Again, the SI ICE operated at this facility was installed prior to June 12, 2006. Therefore, it is not subject to the requirements of this section.

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

Section 63.6585 states that you are subject to this subpart if you own or operate a stationary reciprocating internal combustion engines (RICE) at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

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 or more per year or any combination of HAP at a rate of 25 tons or more per year, except for oil and gas production facilities, a major source of HAP emissions is determined for each surface site. An area source of HAP emissions is a source that is not a major source.

This facility operates one natural gas-fired RICE and one diesel-fired RICE. The facility does not emit any single HAP at a rate of 10 tons per year and does not emit a combination of HAP's at a rate of 25 tons per year. Therefore, this facility can be classified as an area source of HAP emissions and the requirements of this subpart are applicable to the engine.

This subpart was amended on January 1, 2013, and February 27, 2014. The requirements of 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, are applicable to owners and operators of a stationary RICE located

at a major or area source of HAP emissions. This facility is not a major source of HAP emissions and is therefore, by definition, an area source of HAP emissions. Therefore, the requirements of this subpart are applicable to this engine.

The January 1, 2013, amendment included alternative formaldehyde compliance testing options for certain large spark ignition (generally natural gas-fueled) stationary reciprocating internal combustion engines, management practices for a subset of existing spark ignition stationary reciprocating internal combustion engines in sparsely populated areas and alternative monitoring and compliance options for the same engines in populated areas.

The February 27, 2014, amendment included revisions to clarify that a heated probe is not necessary when using ASTM D6522 to measure oxygen or carbon dioxide concentrations. The requirement to use Method 1 or 1A for sampling site and sampling point selection in testing gaseous emissions from engines with smaller ducts is deleted, and single- or three-point sampling, depending on duct size, is added.

These amendments do not affect the facility's RICE engines. No further discussion is required.

**J. 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.

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

a. C-3844-1-9: 49.9 MW NOMINALLY RATED SIMPLE-CYCLE PEAK-DEMAND ELECTRICAL POWER GENERATING SYSTEM CONSISTING OF TWO 25.0 MW PRATT & WHITNEY MODEL #FT4C1 NATURAL GAS-FIRED (TWINPAC CONFIGURATION) GAS TURBINE ENGINES (GTE) WITH DRY LOW NOX (DLN) OR WATER INJECTION TECHNOLOGY, A SHARED SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH OXIDATION CATALYSTS AND INLET AIR FOGGING

1. The permit unit has emissions limits for all five criteria pollutants: NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC.
2. The unit is served by a SCR system to control NO<sub>x</sub> emissions and an oxidation catalyst to control VOC and CO emissions.
3. The SCR system will be assumed to have a NO<sub>x</sub> control efficiency of 90%. The oxidation catalyst will be assumed to have a CO control efficiency of 80%.

Based on 40 CFR 64.2(b)(1)(vi), NO<sub>x</sub> and CO emissions limits are exempt from CAM since the Part 70 permit already specifies a continuous emissions monitoring compliance determination method for both NO<sub>x</sub> and CO.

This permit unit may be subject to CAM for VOC since there is a VOC limit and it has add-on control in the form of an oxidation catalytic system. However as shown below, the pre-control VOC potential to emit is less than the major source threshold of 20,000 lb-VOC/year as shown below.

The natural gas uncontrolled emission factor is 1.75 lb-VOC/hr (permit condition 16).

$$1.75 \text{ lb-VOC/hr} \times 8,760 \text{ hr/yr} = 15,330 \text{ lb-VOC/yr}$$

Therefore, this permit unit is not subject to CAM for VOC.

Additionally, CAM applicability and requirements for this unit have been addressed in the initial TV permit evaluation, and the permit unit has not been modified since then.

b. C-3844-3-2: 440 BHP CATERPILLAR MODEL 3406 TA DIESEL-FIRED LOW USE IC ENGINE POWERING A COMPRESSOR TO START THE GAS TURBINES (C-3844-1)

The permit unit has emissions limits for all five criteria pollutants NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. Unit C-3844-3-2 does not have add-on controls for any pollutant; therefore CAM is not applicable to this unit.

c. C-3844-5-3: 329 BHP CAT MODEL #G379 RICH-BURN NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR AND SERVED BY A 3-WAY CATALYST

1. The permit unit has emissions limits for all five criteria pollutants: NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC.
2. The unit is served by a NSCR system to control NO<sub>x</sub>, CO and VOC emissions.
3. The NSCR system will be assumed to have a NO<sub>x</sub> control efficiency of 90%, a CO control efficiency of 80%, and a VOC control efficiency of 50% (*Update On Emissions - Form 960, Second Editions, Waukesha Engine Division, Dresser Industries, October 1991*)

**Pre-control Annual PE:**

NO<sub>x</sub>:

$$\begin{aligned} \text{PE} &= (0.072 \text{ lb-NO}_x/\text{hp-hr}) \times (329 \text{ hp}) \times (8,760 \text{ hr/yr}) \times (1 \text{ lb}/453.6 \text{ g}) \\ &= 457 \text{ lb-NO}_x/\text{year} \end{aligned}$$

$$\begin{aligned} \text{Pre-control PE} &= \text{PE} \div (1 - \text{CE}) \\ &= (457 \text{ lb-NO}_x/\text{year}) \div (1 - 0.9) \\ &= 4,570 \text{ lb-NO}_x/\text{year} \end{aligned}$$

Since 4,570 lb-NO<sub>x</sub>/yr < 20,000 lb-NO<sub>x</sub>/yr (Major Source threshold for NO<sub>x</sub>), this unit is not subject to CAM for NO<sub>x</sub> emissions.

CO:

$$\begin{aligned} \text{PE} &= (5.69 \text{ lb-CO}/\text{hp-hr}) \times (329 \text{ hp}) \times (8,760 \text{ hr/yr}) \times (1 \text{ lb}/453.6 \text{ g}) \\ &= 36,152 \text{ lb-CO}/\text{year} \end{aligned}$$

$$\begin{aligned} \text{Pre-control PE} &= \text{PE} \div (1 - \text{CE}) \\ &= (36,152 \text{ lb-CO}/\text{year}) \div (1 - 0.8) \\ &= 180,763 \text{ lb-CO}/\text{year} \end{aligned}$$



Since 180,763 lb-CO/yr < 200,000 lb-CO/yr (Major Source threshold for CO), this unit is not subject to CAM for CO emissions.

VOC:

$$\begin{aligned} \text{PE} &= (0.125 \text{ lb-VOC/hp-hr}) \times (329 \text{ hp}) \times (8,760 \text{ hr/yr}) \times (1 \text{ lb}/453.6 \text{ g}) \\ &= 794 \text{ lb-VOC/year} \end{aligned}$$

$$\begin{aligned} \text{Pre-control PE} &= \text{PE} \div (1 - \text{CE}) \\ &= (794 \text{ lb-NO}_x\text{/year}) \div (1 - 0.5) \\ &= 1,588 \text{ lb-NO}_x\text{/year} \end{aligned}$$

Since 1,588 lb-VOC/yr < 20,000 lb-VOC/yr (Major Source threshold for VOC), this unit is not subject to CAM for VOC emissions.

**K. 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners**

40 CFR 82, Subpart B was amended since the previous renewed TV permit was issued. However, the amendments to this subpart do not have any effect on existing permit requirements as addressed by condition 28 on permit C-3844-0-2 of the draft renewed permit.

**L. 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction**

40 CFR 82, Subpart F was amended since the previous renewed TV permit was issued. However, the amendments to this subpart do not have any effect on existing permit requirements as addressed by condition 27 on permit C-3844-0-2 of the draft renewed permit.

**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 does not propose to use any model general permit templates.

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

There were no obsolete permit shields listed in the existing permit requirements.

**X. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

**XI. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.

**XII. ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit
- B. Expiring Title V Operating Permit
- C. Detailed Facility List

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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-3844-0-2

EXPIRATION DATE: 11/30/2017

## 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, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: WELLHEAD POWER PANOCHE, LLC.  
Location: 43649 W PANOCHE RD, FIREBAUGH, CA 93622

C-3844-0-2 : Sep 11 2018 8:39AM - GARCIA

9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] 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 8011 and 8031] 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 8011 and 8041] 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 8011 and 8051] 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 8011 and 8061] 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 8011 and 8071] 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. {98} 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 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-3844-1-9

EXPIRATION DATE: 11/30/2017

## EQUIPMENT DESCRIPTION:

49.9 MW NOMINALLY RATED SIMPLE-CYCLE PEAK-DEMAND ELECTRICAL POWER GENERATING SYSTEM CONSISTING OF TWO 25.0 MW PRATT & WHITNEY MODEL #FT4C1 NATURAL GAS-FIRED (TWINPAC CONFIGURATION) GAS TURBINE ENGINES (GTE) WITH DRY LOW NOX (DLN) OR WATER INJECTION TECHNOLOGY, A SHARED SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH OXIDATION CATALYSTS AND INLET AIR FOGGING

## PERMIT UNIT REQUIREMENTS

1. 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
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Both turbine engines shall be operated simultaneously, except during start up and shut down. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Gas turbine engines 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
5. Gas turbine engines shall be equipped with a continuous monitoring system to measure and record hours of operation and fuel consumption. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
6. Gas turbine engines shall be equipped with a single continuous emissions monitor (CEM) for NOx (before and after SCR system), CO, and O2. The CEM shall meet the requirements of 40 CFR part 60, Appendix F and shall be capable of monitoring emissions during startups and shutdowns as well as during normal operating conditions. [District Rules 2201 and 4703, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
7. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
8. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
9. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



10. Gas turbine engines shall be fired exclusively on natural gas with a sulfur content of no greater than 1.0 grain of sulfur compounds (as S) per 100 dry scf of natural gas. [District Rules 2201 and 4801, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
11. Combined annual emissions from units C-3844-1 and C-3844-5 shall not exceed any of the following limits: 22,816 lb-NOx/year, 7,068 lb-SOx/year, 16,368 lb-PM10/year, 89,032 lb-CO/year, or 6,448 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum annual heat input for both natural gas-fired turbine engines combined shall not exceed 2,480,000 MMBtu/year, measured on a calendar year period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Daily combined NOx emissions from both natural gas-fired turbine engines shall not exceed 148.8 lb-NOx/day, measured on a 24 hour rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Annual combined NOx emissions from both natural gas-fired turbine engines shall not exceed 22,816 lb-NOx/year, measured on a calendar year period. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Except during thermal stabilization periods, combined emissions from both natural gas-fired turbine engines shall not exceed any of the following limits: 6.20 lb-NOx/hour (as NO2) equivalent to 2.5 ppmvd @ 15% O2, 1.92 lb-SOx/hour (as SO2), 4.45 lb-PM10/hour, 24.20 lb-CO/hour equivalent to 16.0 ppmvd @ 15% O2, 1.75 lb-VOC/hour (as methane) equivalent to 2.0 ppmv @ 15% O2, or 10 ppmv ammonia @ 15% O2. All emission limits are based on one (1) hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
16. During periods of thermal stabilization, combined emissions from both natural gas-fired turbine engines shall not exceed any of the following limits: 25.0 lb-NOx/hour (as NO2), 1.92 lb-SOx/hour (as SO2), 4.45 lb-PM10/hour, 24.20 lb-CO/hour, or 1.75 lb-VOC/hour (as methane), based on one hour averages. [District Rules 2201 and 4703, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
17. Thermal stabilization is 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 as stated in Section 3.25 of Rule 4703. [District Rule 4703] Federally Enforceable Through Title V Permit
18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
19. Compliance testing to measure NOx (as NO2), CO, VOC, ammonia emissions, and fuel gas sulfur content requirements of this permit shall be conducted at least once every twelve months. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
20. Compliance testing to measure PM10 shall be conducted at least once every 60 months. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Compliance testing to measure NOx (as NO2), CO, and ammonia emissions shall be conducted within 60 days of switching the turbine combustion emission control technology from Dry Low NOx (DLN) to water injection technology, or vice versa. [District Rules 2201 and 40 CFR 60 GG] Federally Enforceable Through Title V Permit
22. Compliance testing shall be required at least once per twelve-month period for which the technology is used. Switching the turbine combustion emission control technology from Dry Low NOx (DLN) to water injection technology, or vice versa, shall not be required solely for source testing purposes. [District Rule 2201 and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
23. Compliance with 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 measured NOx concentration ppmv at 15% O2 across the catalyst. [District Rule 4102]
24. Compliance testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. 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 thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. 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 and 4703, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
26. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
27. Audits of continuous emission 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
28. The owner/operator shall perform a relative accuracy test audit (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
29. Demonstration of compliance with the annual average sulfur content limit shall be demonstrated by a 12 month rolling average of the sulfur content either (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) tested using ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [District Rule 1081 and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
30. Excess emissions shall be defined as any operating hour in which the 4-hour or 30-day 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 O2 (or both). [40 CFR 60, GG] Federally Enforceable Through Title V Permit
31. The permittee shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective 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; and a negative declaration when no excess emissions occurred. [District Rule 1080 and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
32. The permittee shall submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit when no continuous emission monitoring data for NOx is available or when continuous emission monitoring system is not operating properly. [District Rule 4703] Federally Enforceable Through Title V Permit
33. The owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit
34. 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 Rules 2201 and 4703] Federally Enforceable Through Title V Permit
35. 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 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

36. All records shall be maintained, retained on-site for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rules 2201 and 4703] 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-3844-3-2

EXPIRATION DATE: 11/30/2017

## EQUIPMENT DESCRIPTION:

440 BHP CATERPILLAR MODEL 3406 TA DIESEL-FIRED LOW USE IC ENGINE POWERING A COMPRESSOR TO START THE GAS TURBINES (C-3844-1)

## PERMIT UNIT REQUIREMENTS

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1. 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]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. 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 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
4. 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
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. Total time shall include all operational use and operation for maintenance and testing purposes. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. Operation of this engine for all purposes shall not exceed 1 hour per day and 50 hours per year. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
7. Emissions from this engine shall not exceed any of the following limits: 6.9 g-NO<sub>x</sub>/hp-hr, 3.03 g-CO/hp-hr or 1.12 g-VOC/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from this engine shall not exceed 0.1 g-PM<sub>10</sub>/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
9. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
10. The permittee shall maintain daily and annual records of operation. Records shall include the date, the number of hours of operation, the quantity of diesel fuel used, and the purpose of the operation (e.g., startup of turbine, testing, maintenance, etc.). Such records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 4702, and 40 CFR 60 Subpart ZZZZ] Federally Enforceable Through Title V Permit
11. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
12. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
14. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. The permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63 Subpart ZZZZ] 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-3844-5-3

EXPIRATION DATE: 11/30/2017

## EQUIPMENT DESCRIPTION:

329 BHP CAT MODEL #G379 RICH-BURN NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR AND SERVED BY A 3-WAY CATALYST

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. 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]
11. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
12. The permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier) . [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
14. Combined annual emissions from units C-3844-1 and -5 shall not exceed any of the following limits: 22,816 lb-NOx/year, 7,068 lb-SOx/year, 16,368 lb-PM10/year, 89,032 lb-CO/year, and 6,448 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from this IC engine shall not exceed any of the following limits: 5 ppmvd NOx @ 15% O2 (equivalent to 0.072 g-NOx/hp-hr), 0.0104 g-SOx/hp-hr, 0.071 g-PM10/hp-hr, 670 ppmvd CO @ 15% O2 (equivalent to 5.69 g-CO/hp-hr), or 25 ppmvd VOC @ 15% O2 (equivalent to 0.125 g-VOC/hp-hr). [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
17. Source testing to measure natural gas-combustion NOx, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rule 4702] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702]
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
21. 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
22. 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
23. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] 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.

26. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
27. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
28. The engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
29. The engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
30. The engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
31. The permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. The permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
33. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of the operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of the action(s) taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning operation and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-3844-0-1

EXPIRATION DATE: 11/30/2017

## 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, 9.8.1 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: WELLHEAD POWER PANOCHE, LLC.  
Location: 43649 W PANOCHE RD, FIREBAUGH, CA 93622

C-3844-0-1 Sep 5 2018 5:21PM - GARCIA/C

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 8011 and 8021] 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 8011 and 8031] 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 8011 and 8041] 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 8011 and 8051] 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 8011 and 8061] 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 8011 and 8071] 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. On November 30, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-3844-1-11

EXPIRATION DATE: 11/30/2017

## EQUIPMENT DESCRIPTION:

49.9 MW NOMINALLY RATED SIMPLE-CYCLE PEAK-DEMAND ELECTRICAL POWER GENERATING SYSTEM CONSISTING OF TWO 25.0 MW PRATT & WHITNEY MODEL #FT4C1 NATURAL GAS-FIRED (TWINPAC CONFIGURATION) GAS TURBINE ENGINES (GTE) WITH DRY LOW NOX (DLN) OR WATER INJECTION TECHNOLOGY, A SHARED SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH OXIDATION CATALYSTS AND INLET AIR FOGGING

## PERMIT UNIT REQUIREMENTS

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1. 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
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Both turbine engines shall be operated simultaneously, except during start up and shut down. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Gas turbine engines 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
5. Gas turbine engines shall be equipped with a continuous monitoring system to measure and record hours of operation and fuel consumption. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
6. Gas turbine engines shall be equipped with a single continuous emissions monitor (CEM) for NO<sub>x</sub> (before and after SCR system), CO, and O<sub>2</sub>. The CEM shall meet the requirements of 40 CFR part 60, Appendix F and shall be capable of monitoring emissions during startups and shutdowns as well as during normal operating conditions. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
7. The facility shall maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
8. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
9. 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. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

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

10. Gas turbine engines shall be fired exclusively on natural gas with a sulfur content of no greater than 1.0 grain of sulfur compounds (as S) per 100 dry scf of natural gas. [District Rules 2201 and 4801, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
11. Combined annual emissions from units C-3844-1 and C-3844-5 shall not exceed any of the following limits: 22,816 lb-NOx/year, 7,068 lb-SOx/year, 16,368 lb-PM10/year, 89,032 lb-CO/year, or 6,448 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum annual heat input for both natural gas-fired turbine engines combined shall not exceed 2,480,000 MMBtu/year, measured on a calendar year period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Daily combined NOx emissions from both natural gas-fired turbine engines shall not exceed 148.8 lb-NOx/day, measured on a 24 hour rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Annual combined NOx emissions from both natural gas-fired turbine engines shall not exceed 22,816 lb-NOx/year, measured on a calendar year period. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Except during thermal stabilization periods, combined emissions from both natural gas-fired turbine engines shall not exceed any of the following limits: 6.20 lb-NOx/hour (as NO<sub>2</sub>) equivalent to 2.5 ppmvd @ 15% O<sub>2</sub>, 1.92 lb-SOx/hour (as SO<sub>2</sub>), 4.45 lb-PM10/hour, 24.20 lb-CO/hour equivalent to 16.0 ppmvd @ 15% O<sub>2</sub>, 1.75 lb-VOC/hour (as methane) equivalent to 2.0 ppmv @ 15% O<sub>2</sub>, or 10 ppmv ammonia @ 15% O<sub>2</sub>. All emission limits are based on one (1) hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
16. During periods of thermal stabilization, combined emissions from both natural gas-fired turbine engines shall not exceed any of the following limits: 25.0 lb-NOx/hour (as NO<sub>2</sub>), 1.92 lb-SOx/hour (as SO<sub>2</sub>), 4.45 lb-PM10/hour, 24.20 lb-CO/hour, or 1.75 lb-VOC/hour (as methane), based on one hour averages. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
17. Thermal stabilization is 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 as stated in Section 3.25 of Rule 4703. [District Rule 4703] Federally Enforceable Through Title V Permit
18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
19. Compliance testing to measure NOx (as NO<sub>2</sub>), CO, VOC, ammonia emissions, and fuel gas sulfur content requirements of this permit shall be conducted at least once every twelve months. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
20. Compliance testing to measure PM10 shall be conducted at least once every 60 months. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Compliance testing to measure NOx (as NO<sub>2</sub>), CO, and ammonia emissions shall be conducted within 60 days of switching the turbine combustion emission control technology from Dry Low NOx (DLN) to water injection technology, or vice versa. [District Rules 2201 and 40 CFR 60 GG] Federally Enforceable Through Title V Permit
22. Compliance testing shall be required at least once per twelve-month period for which the technology is used. Switching the turbine combustion emission control technology from Dry Low NOx (DLN) to water injection technology, or vice versa, shall not be required solely for source testing purposes. [District Rule 2201 and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
23. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O<sub>2</sub> =  $\{[a-(b \times c/1,000,000)] \times 1,000,000/b\}$ , 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% O<sub>2</sub> across the catalyst. [District Rule 4102]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. Compliance testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. 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 thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. 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 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
26. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
27. Audits of continuous emission 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
28. The owner/operator shall perform a relative accuracy test audit (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
29. Demonstration of compliance with the annual average sulfur content limit shall be demonstrated by a 12 month rolling average of the sulfur content either (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) tested using ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [District Rule 1081 and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
30. Excess emissions shall be defined as any operating hour in which the 4-hour or 30-day 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 O2 (or both). [40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
31. The permittee shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective 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; and a negative declaration when no excess emissions occurred. [District Rule 1080 and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
32. The permittee shall submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit when no continuous emission monitoring data for NOx is available or when continuous emission monitoring system is not operating properly. [District Rule 4703] Federally Enforceable Through Title V Permit
33. The owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



34. 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 Rules 2201 and 4703] Federally Enforceable Through Title V Permit
35. 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 4703] Federally Enforceable Through Title V Permit
36. All records shall be maintained, retained on-site for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rules 2201 and 4703] 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-3844-3-1

**EXPIRATION DATE:** 11/30/2017

**EQUIPMENT DESCRIPTION:**

440 HP CATERPILLAR MODEL 3406 TA DIESEL-FIRED LOW USE IC ENGINE POWERING A COMPRESSOR TO START THE GAS TURBINES (C-3844-1)

## PERMIT UNIT REQUIREMENTS

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1. 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]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. 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 and 40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
4. 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
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. Total time shall include all operational use and operation for maintenance and testing purposes. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. Operation of this engine for all purposes shall not exceed 1 hour per day and 50 hours per year. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
7. Emissions from this engine shall not exceed any of the following limits: 6.9 g-NOx/hp-hr, 3.03 g-CO/hp-hr or 1.12 g-VOC/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from this engine shall not exceed 0.1 g-PM10/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
9. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
10. The permittee shall maintain daily and annual records of operation. Records shall include the date, the number of hours of operation, the quantity of diesel fuel used, and the purpose of the operation (e.g., startup of turbine, testing, maintenance, etc.). Such records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 4702, and 40 CFR 60, ZZZZ] Federally Enforceable Through Title V Permit
11. On and after May 3, 2013, the engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
12. On and after May 3, 2013, the engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. On and after May 3, 2013, the engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
14. On and after May 3, 2013, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
15. On and after May 3, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
16. On and after May 3, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [District Rule ZZZZ] Federally Enforceable Through Title V Permit
17. On and after May 3, 2013, the permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [District Rule ZZZZ] Federally Enforceable Through Title V Permit
18. On and after May 3, 2013, the permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule ZZZZ] 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-3844-5-2

**EXPIRATION DATE:** 11/30/2017

**EQUIPMENT DESCRIPTION:**

329 BHP CAT MODEL #G379 RICH-BURN NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR AND SERVED BY A 3-WAY CATALYST

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. 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]
11. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
12. The permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier) . [District Rule 4702] Federally Enforceable Through Title V Permit

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

13. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
14. Combined annual emissions from units C-3844-1 and -5 shall not exceed any of the following limits: 22,816 lb-NOx/year, 7,068 lb-SOx/year, 16,368 lb-PM10/year, 89,032 lb-CO/year, and 6,448 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from this IC engine shall not exceed any of the following limits: 5 ppmvd NOx @ 15% O2 (equivalent to 0.072 g-NOx/hp-hr), 0.0104 g-SOx/hp-hr, 0.071 g-PM10/hp-hr, 670 ppmvd CO @ 15% O2 (equivalent to 5.69 g-CO/hp-hr), or 25 ppmvd VOC @ 15% O2 (equivalent to 0.125 g-VOC/hp-hr). [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
17. Source testing to measure natural gas-combustion NOx, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rule 4702] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702]
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
21. 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
22. 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
23. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63, ZZZZ] 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.

26. On and after October 19, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
27. On and after October 19, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
28. On and after October 19, 2013, the engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
29. On and after October 19, 2013, the engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
30. On and after October 19, 2013, the engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
31. On and after October 19, 2013, the permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
32. On and after October 19, 2013, the permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
33. On and after October 19, 2013, the permittee shall maintain monthly records of the occurrence and duration of each malfunction of the operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of the action(s) taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning operation and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63, ZZZZ] 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=3844 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

WELLHEAD POWER PANOCHÉ, LLC. 43649 W PANOCHÉ RD FIREBAUGH, CA 93622	FAC # STATUS: TELEPHONE:	C 3844 A	TYPE: TOXIC ID:	TitleV 51925	EXPIRE ON: AREA: INSP. DATE:	11/30/2017 10 / 08/19
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-3844-1-11	49.9 MW	3020-08B G	1	11,715.00	11,715.00	A	49.9 MW NOMINALLY RATED SIMPLE-CYCLE PEAK-DEMAND ELECTRICAL POWER GENERATING SYSTEM CONSISTING OF TWO 25.0 MW PRATT & WHITNEY MODEL #FT4C1 NATURAL GAS-FIRED (TWINPAC CONFIGURATION) GAS TURBINE ENGINES (GTE) WITH DRY LOW NOX (DLN) OR WATER INJECTION TECHNOLOGY, A SHARED SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH OXIDATION CATALYSTS AND INLET AIR FOGGING
C-3844-3-1	440 bhp IC engine	3020-10 D	1	551.00	551.00	A	440 HP CATERPILLAR MODEL 3406 TA DIESEL-FIRED LOW USE IC ENGINE POWERING A COMPRESSOR TO START THE GAS TURBINES (C-3844-1)
C-3844-5-2	329 bhp IC engine	3020-10 C	1	277.00	277.00	A	329 BHP CAT MODEL #G379 RICH-BURN NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR AND SERVED BY A 3-WAY CATALYST

Number of Facilities Reported: 1