



**AUG 23 2019**

Ms. Kristine Boyer  
Badger Creek Limited  
34759 Lencioni Ave. Ste. A  
Bakersfield, CA 93308

**Re: Notice of Preliminary Decision – Title V Permit Renewal**  
**Facility Number: S-1250**  
**Project Number: S-1181428**

Dear Ms. Boyer:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Badger Creek Limited at 535 Fano Ave., in Bakersfield, California.

The notice of preliminary decision for this project will be posted online 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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
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**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

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# APPENDIX A

## Compliance Assurance Monitoring (CAM) Plan

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*CAMS Juniper CA, LLC*  
34759 Lencioni Avenue  
Bakersfield, CA 93308  
Phone: 661-393-6885  
Fax: 661-393-0885

April 10, 2015

Mr. Leonard Scandura  
Permit Services Manager  
34946 Flyover Ct.  
Bakersfield, CA 93308

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APR 13 2015

SJVAPCD  
Southern Region

**Subject: Facility S-1250  
Compliance Assurance Monitoring Plan**

Dear Mr. Scandura:

Please find enclosed the Compliance Assurance Monitoring (CAM) Plan required pursuant to condition 51 of permit S-1250-1-10. As provided in Condition 51, this plan is submitted in lieu of submittal of an ATC application to reduce the pre-control potential-to-emit for VOC emissions to not greater than the major source threshold.

Please direct any questions or comments to me at (661) 387-7802.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Rogge". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Adam Rogge  
Director of Regulatory Compliance

**Compliance Assurance Monitoring Plan  
SJVUAPCD Facility ID#: S-1250**

Badger Creek, Ltd. has prepared the following Compliance Assurance Monitoring Plan as required to meet the requirements of 40 CFR Part 64. In general, CAM is applicable to emission sources which utilize a control device to meet a non-exempt emission standard and have pre-control emissions above the major source threshold.

**Applicability Determination**

CAM applicability is determined individually for each pollutant-specific emission unit (PSEU) as it is defined in Part 64. Applicable thresholds within the San Joaquin Valley Air Basin are shown in the following table.

Major Source Thresholds (12/18/08 Revision of Rule 2201)

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

**1. Emission Unit**

Badger Creek, Ltd. contains a single emission unit.

S-1250-1-10: 48.5 MW Cogeneration System with SCR Including Stewart & Stevenson GE Model 5000 Gas-Fired Turbine, Heat Recovery Steam Generator and Inlet Air Absorption Chiller and Heat Exchanger

**2. Potential to Emit**

The post control potentials to emit of this unit are as follows:

Pollutant	lb/day	lb/year	ton/year
NOx	147.9	53,983	27.0
SOx	7.0	2,555	1.3
PM10	79.0	28,835	14.4
CO	264.0	96,360	48.2
VOC	128.9	47,049	23.5

**3. Applicability of CAM**

**NOx Emissions** – The unit is not subject to CAM for NOx emissions. The post control emissions and pre-control NOx emissions exceed the major source threshold. However, the

unit is equipped with Continuous Emissions Monitoring for NOx; therefore it is exempt from CAM.

**SOx Emissions** – The unit is not subject to CAM for SOx emissions because there are no add on controls SOx and the pre and post-control emissions are less than the major source threshold.

**PM<sub>10</sub> Emissions** – The unit is not subject to CAM for PM10 emissions because there are no add on controls for PM10 and the pre and post control emissions are less than the major source threshold.

**CO Emissions** – The unit is not subject to CAM for CO emissions. Although the unit is equipped with emission controls, and pre-control emissions exceed the major source threshold, the unit is equipped with Continuous Emissions Monitoring for CO.

**VOC Emissions** – The unit is subject to CAM because the pre-control emissions of VOC exceed the major source thresholds, the unit is equipped with add-on controls for VOC emissions, and there is no Continuous Emissions Monitoring system in place for VOC emissions. The post control potential to emit shown in section 2 is equal to the uncontrolled emissions of VOC. (Reference KCAPCD project 4192001A, dated 1/12/1990)

Plan: Gas Turbine VOC CAM Plan

COMPLIANCE ASSURANCE MONITORING:  
CATALYST FOR VOC PM CONTROL – GAS TURBINE

I. Background

A. Emissions Unit

Description: 48.5 MW Cogeneration Facility Powered by a Gas Turbine  
Identification: Gas Turbine  
Facility: Badger Creek, Ltd.  
Bakersfield, USA

B. Applicable Regulation, Emissions Limit, and Monitoring Requirements

Permit: S-1250-1-10  
Emissions Limits:

VOC 5.33 ppmv dry @ 15% O<sub>2</sub>, 5.37 lb/hr, 128.9 lb/day

Monitoring Requirements:

The permit contains the following requirements:

- Inlet gas temperature to catalyst bed shall be maintained within range recommended by catalyst manufacturer except during periods of startup and shutdown as defined in this permit. (Condition 21)
- Unfired heat recovery boiler shall be equipped with continuously recording NO<sub>x</sub> emissions monitors (CEMS) located ahead of SCR catalyst and continuously recording NO<sub>x</sub>, CO and O<sub>2</sub> emissions monitors located in boiler exhaust stack. (Condition 25)
- Source test results for CO shall be provided to the District annually. (Condition 27).
- Gas temperature at SCR catalyst section inlet shall be monitored by an operational temperature indicator. (Condition 36)
- The operator shall monitor and record the exhaust gas temperature at oxidation catalyst inlet. (Condition 37)

C. Control Technology:

The gas-fired turbine is equipped with CO oxidation catalyst. CO oxidation catalysts are also used on gas-fired turbines to control VOC emissions in addition to control of CO emissions. The catalyst usually contains precious metals which promote the oxidation of CO and hydrocarbon compounds (VOCs) to carbon dioxide (CO<sub>2</sub>) and water (H<sub>2</sub>O) as the emission stream passes through the catalyst bed. The oxidation process takes place spontaneously, without the requirement for introducing reactants. The performance of these oxidation catalyst systems on combustion turbines results in 90-plus percent control of CO and about 85 to 90 percent control of formaldehyde. (ref. AP42, Chapter 3.1)

## II. Monitoring Approach

The key elements of the monitoring approach for VOC are presented in the following table. The selected performance indicators are the signal from a CO CEMS and the inlet temperature to the CO Catalyst.

**MONITORING APPROACH**

	Indicator No. 1	Indicator No. 2
<p><b>I. Indicator</b></p> <p><b>Measurement Approach</b></p>	<p><b>CO Catalyst Temperature</b></p> <p>A temperature probe is used to measure the exhaust gas temperature at the inlet of the CO Catalyst.</p>	<p><b>CO Concentration</b></p> <p>A continuous emission monitoring system (CEMS) is used to measure CO concentrations in the exhaust stack.</p>
<p><b>II. Indicator Range</b></p>	<p>An excursion is defined as an hourly average temperature of greater than 930 degrees F or less than 760 degrees F. Excursions trigger an inspection, corrective action, and a reporting requirement.</p>	<p>An excursion is defined as an hourly average CO concentration exceeding 11 ppmv dry @ 15% O<sub>2</sub>. Excursions trigger an inspection, corrective action, and a reporting requirement.</p>
<p><b>III. Performance Criteria</b></p> <p><b>A. Data Representativeness</b></p>	<p>The temperature probe is located in the exhaust stack after the SCR catalyst at the oxidation catalyst inlet. The temperature range is established per manufacturer's recommendations.</p>	<p>The CEMS continuously measures CO emissions from the turbine exhaust. The CEMS probe is located in an area of the exhaust that is representative of the gas stream. Compliance with CO emission limits indicates that the catalyst is operating within design specifications.</p>
<p><b>B. Verification of Operational Status</b></p>	<p>Annual source test.</p>	<p>Annual source test.</p>
<p><b>C. QA/QC Practices and Criteria</b></p>	<p>Trained personnel perform inspection, calibration and maintenance of the temperature measurement system.</p>	<p>Daily drift checks, quarterly absolute calibration (ACA) audits and annual response calibration audits (RCA). Quality assurance testing and maintenance of the CEMS is conducted in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F.</p>
<p><b>D. Monitoring Frequency</b></p>	<p>Continuous</p>	<p>Continuous</p>
<p><b>E. Data Collection Procedures</b></p>	<p>The data acquisition system (DAS) collects a data point every second. The 1-second data are reduced to a 1-minute, a 15-minute, and then a 1-hour average temperature. The 1-hour average data are archived for at least 5 years.</p>	<p>The data acquisition system (DAS) collects a data point every second. The 1-second data are reduced to a 1-minute, a 15-minute, and then a 1-hour average CO emissions rate. The 1-hour average data are archived for at least 5 years.</p>
<p><b>Averaging Period</b></p>	<p>1 hour</p>	<p>1 hour</p>



## MONITORING APPROACH JUSTIFICATION

### I. Background

One natural gas-fired GE 5000 turbine operates at this facility. The turbine is used to generate electricity and is rated at 48.5 MW. A heat recovery steam generator is installed in the exhaust of the gas-fired turbine. Steam is used for onsite purposes, and sold to offsite crude oil production operations.

The gas turbine is equipped with steam injection and SCR catalyst with ammonia injection for control of NO<sub>x</sub> emissions. A CO catalyst is installed before the SCR catalyst and is used for CO and VOC control.

### II. Rationale for Selection of Performance Indicators

The performance indicators selected are the CO concentration measured by the CEMs and measurement of the exhaust temperature inlet to the CO catalyst. Proper operation of the CO catalyst is critical to compliance with the CO emission limits. Measurement of CO emissions and CO inlet temperatures assure that the catalyst is operating within design specifications.

Operation of the CO catalyst to maintain emissions below permit limits also assures compliance with the VOC emission limits.

### III. Rationale for Selection of Indicator Ranges

Proper operation of the CO catalyst assures compliance with the VOC emission limits. As noted in the original project, the CO catalyst is expected control up to 50% of the VOC emissions from the gas turbine. However, the daily VOC emission limit in the current permit, 128.9 lb/day, is very close to the uncontrolled VOC emissions calculated in the KCAPCD project referenced above, 130.72 lb/day. Proper operation of the CO catalyst will assure compliance with the VOC limit.

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# APPENDIX B

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: S-1250-0-5

EXPIRATION DATE: 03/31/2019

## 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: BADGER CREEK LIMITED  
Location: HEAVY OIL CENTRAL, OILFIELD RD, CA  
S-1250-0-5 : Aug 9 2019 10:54AM -- PROCOPIS

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 11/00, 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. No air contaminant shall be released into the atmosphere that causes a public nuisance. [District Rule 4102]
42. The facility shall comply with all applicable requirements of Rule 4663 (9/20/07). [District Rule 4663]
43. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit
44. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
45. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit

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

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

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

59. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1250-1-14

**EXPIRATION DATE:** 03/31/2019

**SECTION:** 23 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

48.5 MW COGENERATION SYSTEM WITH SCR INCLUDING STEWART & STEVENSON GE MODEL 5000 GAS-FIRED TURBINE, HEAT RECOVERY STEAM GENERATOR, AND INLET AIR ABSORPTION CHILLER AND HEAT EXCHANGER

## PERMIT UNIT REQUIREMENTS

1. Compliance with permit conditions in the Title V permit shall be deemed compliance with following subsumed requirements: Rule 108 (San Joaquin), Rule 108.1 (San Joaquin), and Rule 407 (San Joaquin) as of the date of permit issuance. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a), (a)(1), (a)(2), (b), and (f); 60.333 (a) and (b); 60.334(a), (b)(2), and (c); and 60.335(b) and (c); 60.7 (b), 60.8, 60.13, and 64; District Rule 1080 (as amended December 17, 1992), Sections 6.3, 6.4, 6.5, 7.0, 7.1, 7.2, 7.3, 8.0, 9.0, 10.0, and 11.0; and District Rule 1081 (as amended December 16, 1993) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Operations during periods of startup and shutdown shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the emission limit shown in this permit during periods of startup and shutdown be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard. [40 CFR 60.8 (c)] Federally Enforceable Through Title V Permit
3. Start up time shall be defined as a time during the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shut down shall be defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. The start up and shutdown time shall not to exceed two hours. [40 CFR Subpart A 60.2; District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
4. Gas-fired turbine shall be equipped with combustor steam injection and an SCR system utilizing ammonia as the reducing agent for NOx controls. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
5. Gas-fired turbine shall be equipped with CO reactor of sufficient catalyst volume to meet CO and VOC emissions limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
6. All gas turbine engine exhaust shall flow through catalyst bed. [40 CFR 60.7(c) and District Rule 2201] Federally Enforceable Through Title V Permit
7. Gas turbine combustor steam injection system shall be equipped with continuously recording steam-to-fuel injection rate monitoring system. [40 CFR 60.334(a); District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
8. Turbine lube oil reservoir shall be equipped with mist collectors with return line to the turbine lube oil reservoir. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Turbine air/oil separator shall be equipped with a heat exchanger and an air/oil final separator with return lines to turbine lube oil reservoir. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Generator lube oil reservoir shall be equipped with a mist collector and two vent breathers with collection piping from generator bearings and return piping to generator lube oil reservoir. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC emissions at gas turbine exhaust shall not exceed 5.37 lbs/hour and 128.9 lbs/day, except during periods of startup and shutdown as defined in this permit. The maximum VOC emission rate from turbine lube oil cooler/accumulating vents shall not exceed 1.9 lbs/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum VOC emissions concentration (as CH<sub>4</sub>) at turbine exhaust shall not exceed 5.33 ppmv dry at 15% O<sub>2</sub>, except during periods of startup and shutdown, and as defined in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The emission rate from the gas turbine exhaust shall not exceed the following: 79.0 lbs-PM<sub>10</sub>/day, 147.9 lbs-NO<sub>x</sub> /day (as NO<sub>2</sub>), 7.0 lbs-SO<sub>x</sub>/day (SO<sub>2</sub>), and 264.0 lbs-CO/day. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
14. The owner or operator shall not operate the gas turbine under load conditions, excluding start up, shut down, or reduced load period, which results in the measured NO<sub>x</sub> emissions concentration exceeding 3.8 ppmv @ 15% O<sub>2</sub>. [District Rules 2201 and 4703; 40 CFR 60.332(a)(1), (a)(2)] Federally Enforceable Through Title V Permit
15. The owner or operator shall not operate the gas turbine under load conditions, excluding start up, shut down, or reduced load period, which results in the measured CO emissions concentration exceeding 11 ppmv @ 15% O<sub>2</sub>. [District Rule 2201 and 4703] Federally Enforceable Through Title V Permit
16. The total particulate matter (PM) emissions from the gas turbine exhaust shall not exceed 0.1 gr/dscf. Calculations done by the SJVUAPCD show that natural gas-fired turbine emissions do not exceed this standard. No monitoring of PM is required. [District Rule 4201] Federally Enforceable Through Title V Permit
17. Ammonia injection rate shall be controlled to maintain ammonia slip to less than 20 ppmv. Compliance with the ammonia slip (ppmv) emission limits shall be demonstrated by sample collection taken by independent testing laboratory annually within 60 days prior to permit anniversary date. The District shall be notified prior to the completion of any sampling event. Official test results and field data collection shall be submitted to the District within 60 days of testing. [District Rule 4102]
18. Compliance with NO<sub>x</sub> (ppmv), CO (ppmv), VOC (hourly), and ammonia (ppmv) emissions limits shall be demonstrated by District witnessed sample collection by independent testing laboratory annually within 60 days prior to permit anniversary date. [District Rule 2201] Federally Enforceable Through Title V Permit
19. 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. Official test results and field data collected by source tests required by conditions on this permit shall be submitted to the District within 60 days of testing. [District Rules 1081 and 4703] Federally Enforceable Through Title V Permit
20. All CEMS data required to comply with the conditions in this permit shall be rounded to the same number of significant digits as the specified limits, but not less than two significant digits. [40 CFR 60.13 (h)] Federally Enforceable Through Title V Permit
21. Inlet gas temperature to catalyst bed shall be maintained within range recommended by catalyst manufacturer except during periods of startup and shutdown as defined in this permit. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
22. Gas turbine engine shall be fired exclusively with PUC regulated quality natural gas. The fuel gas sulfur content shall not exceed 0.25 gr H<sub>2</sub>S/100 scf. [District Rules 2201 and 4801] 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.

23. The gas turbine steam injection rate shall be maintained at a steam-to-fuel ratio that results in compliance with emissions limits except during periods of startup, shutdown, and malfunction as defined in this permit. Only malfunctions as defined in 40 CFR Part 60 qualify for this exemption. Startup and shutdown of gas turbine engine, as defined in 40 CFR Subpart A 60.2, shall not exceed a time period of three hours and one hour, respectively, per occurrence. [40 CFR Part 60, Subpart A, and District Rules 2201 and 4001] Federally Enforceable Through Title V Permit
24. The circular cross section exhaust stack (after SCR unit) shall be equipped with permanent provisions to allow collection of stack gas samples consistent with U.S. EPA test methods and equipped with flow straighteners, if necessary, to minimize turbulence. The facility shall comply with this and all applicable compliance testing procedures described in District Rule 1081 (amended December 17, 1992). [40 CFR Part 60, and District Rules 4703 and 1081]
25. Unfired heat recovery boiler shall be equipped with continuously recording NOx emissions monitors (CEMS) located ahead of SCR catalyst and continuously recording NOx, CO, and O2 emissions monitors located in boiler exhaust stack. CEMS shall meet the performance specification requirements in 40 CFR Part 60, Appendix B, 40 CFR Part 51, Appendix P, and Part 60, Appendix B, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the U.S. EPA. CEMS data can be used to determine compliance with emission limits. Continuous emission monitoring for NOx, CO, and O2 serving the exhaust gas stream shall conform to District Rule 1080. [District Rules 1080, 2201, and 4703; 40 CFR 60.13] Federally Enforceable Through Title V Permit
26. The facility shall comply with the applicable requirements for quality assurance testing and maintenance of the CEMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080 and 40 CFR Part 60] Federally Enforceable Through Title V Permit
27. NOx concentrations from gas turbine exhaust shall be determined using U.S. EPA Method 7E or 20; O2 concentration shall be determined using U.S. EPA Method 3, 3A, or 20. CO emissions shall be determined using U.S. EPA Method 10 or 10B. Source test results will be provided to the District annually. U.S. EPA approved alternate test methods may also be used to address the source testing requirement of this permit. [District Rules 1081, 2520, and 4703; 40 CFR Part 60.335(b) and (c), and 60.8] Federally Enforceable Through Title V Permit
28. CEMS results shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.1.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the U.S. EPA. [District Rule 1080]
29. Except NOx and CO emission data obtained for compliance demonstration purposes, CEMS data shall be averaged in accordance with the requirements specified under 40 CFR Part 60.13. Compliance results for NOx and CO shall be averaged over a three-hour period. [District Rule 4703 and 40 CFR 60.13] Federally Enforceable Through Title V Permit
30. On days of turbine engine startup/shutdown, permittee shall demonstrate compliance with NOx and CO daily emissions limits with CEMS data, fuel rate data, and daily hours of operation data. A written record of the compliance demonstration shall be maintained and made available for District inspection for a period of five years. [District Rule 1080, 2201, and 2520] Federally Enforceable Through Title V Permit
31. Except during system breakdowns, repairs and maintenance, calibration checks, and zero and span adjustments, the CEMS shall be in continuous operation while the turbine is operating. NOx emissions in ppmv (corrected to 15% O2) and CO and O2 concentrations must be recorded continuously (except as noted elsewhere) and data shall be reduced to 15-minute averages per 40 CFR Part 60.13 (e)(2). [District Rule 2201 and 40 CFR 60.486 (b), (c), & (d)] Federally Enforceable Through Title V Permit
32. Records shall be maintained and shall contain the occurrence and duration 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, maintenance of any CEMS that have been installed pursuant to District Rule 1080; emission measurements; and daily actual local startup and stop time, length and reason for reduced load periods, daily and total hours of operation and quantity of fuel used. [District Rule 1080, 2201, and 4703; 40 CFR 60.332(a), (b); 60.7(b), and 64] Federally Enforceable Through Title V Permit
33. Compliance with the requirements for fuel gas sulfur content and PUC regulated quality gas shall be by fuel gas sample analysis by independent testing laboratory taken at time of annual stack gas sampling. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

34. Operators of CEMS shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken, and preventive measures adopted; averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; applicable time and date of each period during which the CEMS 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. For clarification, operator shall use the same averaging periods as written into the permit for demonstrating compliance. [District Rule 1080 and 40 CFR 60.7(c) and 64] Federally Enforceable Through Title V Permit
35. Facility shall notify the APCO of a violation of any emission standards indicated by the CEMS within 96 hours of occurrence. The APCO shall be notified within eight hours after the detection of a breakdown of CEMS monitoring equipment and 24 hours prior to a planned shutdown of monitoring equipment greater than 4 hours in duration. [District Rules 1080 and 2520, and 40 CFR 60.334(c)] Federally Enforceable Through Title V Permit
36. Monitoring of the exhaust gas temperature at the inlet to the CO catalyst and the CO concentration measured by the CEMS shall be used as performance indicators of compliance with the VOC emissions limits. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. A computerized data acquisition system shall be used to collect temperature and CO concentration every 1 second, which will be reduced to a 1-hour average temperature and 1-hour average CO concentration, respectively. [40 CFR Part 64] Federally Enforceable Through Title V Permit
38. The exhaust gas temperature at the inlet of the CO catalyst shall be kept within the following range: between 760 F and 930 F. Any exceedance to this range shall trigger a, inspection, corrective action and reporting requirements. [40 CFR Part 64] Federally Enforceable Through Title V Permit
39. Gas temperature at SCR catalyst section inlet shall be monitored by an operational temperature probe located in the exhaust stack after the SCR catalyst at the oxidation catalyst inlet. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
40. The operator shall continuously monitor and record exhaust gas temperature at oxidation catalyst inlet. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
41. Ammonia injection grid shall be equipped with operational ammonia flow meter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit
42. Any lube oil cooler/accumulating vent having visible emissions with an opacity of 5% or greater shall be tested to demonstrate compliance with VOC hourly emissions limit. Official test results/field data shall be submitted within 60 days of testing. [District Rule 2201] Federally Enforceable Through Title V Permit
43. Maximum heat input rating of General Electric LM-5000 gas-fired turbine engine shall not exceed 457.8 MMBtu/hr and nominal generator output shall not exceed 48.5 MW. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Unfired heat recovery steam generator shall not be designed for supplementary firing. [District Rule 2201] Federally Enforceable Through Title V Permit
45. Gas turbine engine shall be equipped with continuously recording fuel gas flowmeter. [District Rule 2201] Federally Enforceable Through Title V Permit
46. Installed SCR unit shall provide space for additional catalyst if source operation cannot achieve sampling limits. [District Rule 2201] Federally Enforceable Through Title V Permit
47. Steam produced at this facility for use in oil production operations shall affect only wells connected to well vent vapor recovery systems approved by District. [District Rule 2201] Federally Enforceable Through Title V Permit
48. 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 Rules 1080 and 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

49. Trained personnel shall perform inspections, calibration, and maintenance of the temperature measurement system to ensure the continuing validity of the data. [40 CFR Part 64] Federally Enforceable Through Title V Permit
50. 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 Rules 1080 and 2520] Federally Enforceable Through Title V Permit
51. Audits of monitors shall be conducted semi-annually by independent laboratory in accordance with EPA guidelines, witnessed by District, and reports shall be submitted to District within 30 days of such audit. [District Rule 2201] Federally Enforceable Through Title V Permit
52. A written record of the compliance demonstrations for NO<sub>x</sub> and CO daily emissions limits, as required in the condition above, shall be maintained and made available for District inspection for a period of two years. [District Rule 2201]
53. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit

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

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# APPENDIX C

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: S-1250-0-4

EXPIRATION DATE: 03/31/2019

## 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: BADGER CREEK LIMITED  
Location: HEAVY OIL CENTRAL, OILFIELD RD, CA  
S-1250-0-4 : Aug 9 2010 10:56AM -- PROCOPIB

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 that causes a public nuisance. [District Rule 4102]
42. The facility shall comply with all applicable requirements of Rule 4663 (9/20/07). [District Rule 4663]
43. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit
44. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
45. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
46. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit
47. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit
48. An affected unit shall be subject to the sulfur dioxide requirements starting on the later of January 1, 2000, or the deadline for monitoring certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3) that is not a substitution or compensating unit. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit
49. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit

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

50. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit
51. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit
52. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit
53. The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides. [40 CFR 72] Federally Enforceable Through Title V Permit
54. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
55. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit
56. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit
57. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit
58. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit
59. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1250-1-13

EXPIRATION DATE: 03/31/2019

SECTION: 23 TOWNSHIP: 28S RANGE: 27E

## EQUIPMENT DESCRIPTION:

48.5 MW COGENERATION SYSTEM WITH SCR INCLUDING STEWART & STEVENSON GE MODEL 5000 GAS-FIRED TURBINE, HEAT RECOVERY STEAM GENERATOR, AND INLET AIR ABSORPTION CHILLER AND HEAT EXCHANGER

## PERMIT UNIT REQUIREMENTS

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1. Compliance with permit conditions in the Title V permit shall be deemed compliance with following subsumed requirements: Rule 108 (San Joaquin), Rule 108.1 (San Joaquin), and Rule 407 (San Joaquin) as of the date of permit issuance. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a), (a)(1), (a)(2), (b), and (f); 60.333 (a) and (b); 60.334(a), (b)(2), (c)(1), (c)(2), and (c)(3); and 60.335(b), (c)(2), (c)(3), and (d); 40 CFR 60.7 (b), 60.8, 60.8(d), 60.13, and 60.13(b); District Rule 1080 (as amended December 17, 1992), Sections 6.3, 6.4, 6.5, 7.0, 7.1, 7.2, 7.3, 8.0, 9.0, 10.0, and 11.0; and District Rule 1081 (as amended December 16, 1993) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
2. Operations during periods of startup and shutdown shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the emission limit shown in this permit during periods of startup and shutdown be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard. [40 CFR 6.8 (c)] Federally Enforceable Through Title V Permit
3. Start up time shall be defined as a time during the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shut down shall be defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. The start up and shutdown time shall not to exceed two hours. [40 CFR Subpart A 60.2; District NSR Rule and District Rule 4703, 3.26 and 3.29] Federally Enforceable Through Title V Permit
4. Gas-fired turbine shall be equipped with combustor steam injection and an SCR system utilizing ammonia as the reducing agent for NOx controls. [District NSR Rule and District Rule 4703, 5.1] Federally Enforceable Through Title V Permit
5. Gas-fired turbine shall be equipped with CO reactor of sufficient catalyst volume to meet CO and VOC emissions limits. [District NSR Rule and District Rule 4703, 5.2] Federally Enforceable Through Title V Permit
6. All gas turbine engine exhaust shall flow through catalyst bed. [40 CFR 60.7(c) and District NSR Rule] Federally Enforceable Through Title V Permit
7. Gas turbine combustor steam injection system shall be equipped with continuously recording steam-to-fuel injection rate monitoring system. [40 CFR 60.334(a); District Rule 2201; District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
8. Turbine lube oil reservoir shall be equipped with mist collectors with return line to the turbine lube oil reservoir. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. Turbine air/oil separator shall be equipped with a heat exchanger and an air/oil final separator with return lines to turbine lube oil reservoir. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Generator lube oil reservoir shall be equipped with a mist collector and two vent breathers with collection piping from generator bearings and return piping to generator lube oil reservoir. [District NSR Rule] Federally Enforceable Through Title V Permit
11. VOC emissions at gas turbine exhaust shall not exceed 5.37 lbs/hour and 128.9 lbs/day, except during periods of startup and shutdown as defined in this permit. The maximum VOC emission rate from turbine lube oil cooler/accumulating vents shall not exceed 1.9 lbs/day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The maximum VOC emissions concentration (as CH<sub>4</sub>) at turbine exhaust shall not exceed 5.33 ppmv dry at 15% O<sub>2</sub>, except during periods of startup and shutdown, and as defined in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The emission rate from the gas turbine exhaust shall not exceed the following: 79.0 lbs-PM<sub>10</sub>/day, 147.9 lbs-NO<sub>x</sub> /day (as NO<sub>2</sub>), 7.0 lbs-SO<sub>x</sub>/day (SO<sub>2</sub>), and 264.0 lbs-CO/day. [District NSR Rule and District Rule 4201.] Federally Enforceable Through Title V Permit
14. The owner or operator shall not operate the gas turbine under load conditions, excluding start up, shut down, or reduced load period, which results in the measured NO<sub>x</sub> emissions concentration exceeding 3.8 ppmv @ 15% O<sub>2</sub>. [40 CFR 60.332(a)(1), (a)(2) and District Rule 4703, 5.1.2] [District NSR Rule; 40 CFR 60.332(a)(1), (a)(2) and District Rule 4703, 5.1.2] Federally Enforceable Through Title V Permit
15. The owner or operator shall not operate the gas turbine under load conditions, excluding start up, shut down, or reduced load period, which results in the measured CO emissions concentration exceeding 11 ppmv @ 15% O<sub>2</sub>. [District NSR Rule and District Rule 4703, 5.2] Federally Enforceable Through Title V Permit
16. The total particulate matter (PM) emissions from the gas turbine exhaust shall not exceed 0.1 gr/dscf. Calculations done by the SJVUAPCD show that natural gas-fired turbine emissions do not exceed this standard. No monitoring of PM is required. [District Rule 4201] Federally Enforceable Through Title V Permit
17. Ammonia injection rate shall be controlled to maintain ammonia slip to less than 20 ppmv. Compliance with the ammonia slip (ppmv) emission limits shall be demonstrated by sample collection taken by independent testing laboratory annually within 60 days prior to permit anniversary date. The District shall be notified prior to the completion of any sampling event. Official test results and field data collection shall be submitted to the District within 60 days of testing. [District Rule 4102]
18. Compliance with NO<sub>x</sub> (ppmv), CO (ppmv), VOC (hourly), and ammonia (ppmv) emissions limits shall be demonstrated by District witnessed sample collection by independent testing laboratory annually within 60 days prior to permit anniversary date. [District NSR Rule] Federally Enforceable Through Title V Permit
19. 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. Official test results and field data collected by source tests required by conditions on this permit shall be submitted to the District within 60 days of testing. [District Rule 1081, 7.0 and District Rule 4703, 6.3] Federally Enforceable Through Title V Permit
20. All CEMS data required to comply with the conditions in this permit shall be rounded to the same number of significant digits as the specified limits, but not less than two significant digits. [40 CFR 60.13 (h)] Federally Enforceable Through Title V Permit
21. Inlet gas temperature to catalyst bed shall be maintained within range recommended by catalyst manufacturer except during periods of startup and shutdown as defined in this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Gas turbine engine shall be fired exclusively with PUC regulated quality natural gas. The fuel gas sulfur content shall not exceed 0.25 gr H<sub>2</sub>S/100 scf. [District NSR Rule and District Rule 4801] 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.

23. The gas turbine steam injection rate shall be maintained at a steam-to-fuel ratio that results in compliance with emissions limits except during periods of startup, shutdown, and malfunction as defined in this permit. Only malfunctions as defined in 40 CFR Part 60 qualify for this exemption. Startup and shutdown of gas turbine engine, as defined in 40 CFR Subpart A 60.2, shall not exceed a time period of three hours and one hour, respectively, per occurrence. [40 CFR Part 60, Subpart A; District NSR Rule; District Rule 4001] Federally Enforceable Through Title V Permit
24. The circular cross section exhaust stack (after SCR unit) shall be equipped with permanent provisions to allow collection of stack gas samples consistent with U.S. EPA test methods and equipped with flow straighteners, if necessary, to minimize turbulence. The facility shall comply with this and all applicable compliance testing procedures described in District Rule 1081 (amended December 17, 1992). [40 CFR Part 60; District Rule 4703; District Rule 1081, 3.0, 5.0, and 6.0]
25. Unfired heat recovery boiler shall be equipped with continuously recording NO<sub>x</sub> emissions monitors (CEMS) located ahead of SCR catalyst and continuously recording NO<sub>x</sub>, CO, and O<sub>2</sub> emissions monitors located in boiler exhaust stack. CEMS shall meet the performance specification requirements in 40 CFR Part 60, Appendix B, 40 CFR Part 51, Appendix P, and Part 60, Appendix B, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the U.S. EPA. CEMS data can be used to determine compliance with emission limits. Continuous emission monitoring for NO<sub>x</sub>, CO, and O<sub>2</sub> serving the exhaust gas stream shall conform to District Rule 1080. [District Rule 1080, 4.0 and 5.0; District NSR Rule, District Rule 4703; 40 CFR 60.13] Federally Enforceable Through Title V Permit
26. The facility shall comply with the applicable requirements for quality assurance testing and maintenance of the CEMS equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080, 6.0 and 40 CFR Part 60] Federally Enforceable Through Title V Permit
27. NO<sub>x</sub> concentrations from gas turbine exhaust shall be determined using U.S. EPA Method 7E or 20; O<sub>2</sub> concentration shall be determined using U.S. EPA Method 3, 3A, or 20. CO emissions shall be determined using U.S. EPA Method 10 or 10B. Source test results will be provided to the District annually. U.S. EPA approved alternate test methods may also be used to address the source testing requirement of this permit. [District Rule 1081; District Rule 2520, 9.3.1; District Rule 4703, 5.1, 6.3, & 6.4; 40 CFR Subpart GG 60.335(b) and (c); 40 CFR Subpart A 60.8] Federally Enforceable Through Title V Permit
28. CEMS results shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.1.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the U.S. EPA. [District Rule 1080, 7.2]
29. Except NO<sub>x</sub> and CO emission data obtained for compliance demonstration purposes, CEMS data shall be averaged in accordance with the requirements specified under 40 CFR Part 60.13. Compliance results for NO<sub>x</sub> and CO shall be averaged over a three-hour period. [District Rule 4703, 5.0 and 6.2, 40 CFR 60.13] Federally Enforceable Through Title V Permit
30. On days of turbine engine startup/shutdown, permittee shall demonstrate compliance with NO<sub>x</sub> and CO daily emissions limits with CEMS data, fuel rate data, and daily hours of operation data. A written record of the compliance demonstration shall be maintained and made available for District inspection for a period of five years. [District Rule 1080, 7.1; District NSR Rule; District Rule 2520, 9.3.2, 9.4.2] Federally Enforceable Through Title V Permit
31. Except during system breakdowns, repairs and maintenance, calibration checks, and zero and span adjustments, the CEMS shall be in continuous operation while the turbine is operating. NO<sub>x</sub> emissions in ppmv (corrected to 15% O<sub>2</sub>) and CO and O<sub>2</sub> concentrations must be recorded continuously (except as noted elsewhere) and data shall be reduced to 15-minute averages per 40 CFR Part 60.13 (e)(2). [District NSR Rule; 40 CFR 60.486 (b), (c), & (d)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

32. Records shall be maintained and shall contain the occurrence and duration 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, maintenance of any CEMS that have been installed pursuant to District Rule 1080; emission measurements; and daily actual local startup and stop time, length and reason for reduced load periods, daily and total hours of operation and quantity of fuel used. [District Rule 1080, 4.0 and 7.3; District NSR Rule; District Rule 4703; 40 CFR 60.332(a), (b); 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
33. Compliance with the requirements for fuel gas sulfur content and PUC regulated quality gas shall be by fuel gas sample analysis by independent testing laboratory taken at time of annual stack gas sampling. [District NSR Rule]
34. Operators of CEMS shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken, and preventive measures adopted; averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; applicable time and date of each period during which the CEMS 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. For clarification, operator shall use the same averaging periods as written into the permit for demonstrating compliance. [60.7(c); District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
35. Facility shall notify the APCO of a violation of any emission standards indicated by the CEMS within 96 hours of occurrence. The APCO shall be notified within eight hours after the detection of a breakdown of CEMS monitoring equipment and 24 hours prior to a planned shutdown of monitoring equipment greater than 4 hours in duration. [40 CFR 60.334(c); District Rule 1080, 9.0 and 10.0; District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
36. Gas temperature at SCR catalyst section inlet shall be monitored by an operational temperature indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
37. The operator shall monitor and record exhaust gas temperature at oxidation catalyst inlet. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Ammonia injection grid shall be equipped with operational ammonia flow meter and injection pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
39. Any lube oil cooler/accumulating vent having visible emissions with an opacity of 5% or greater shall be tested to demonstrate compliance with VOC hourly emissions limit. Official test results/field data shall be submitted within 60 days of testing. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Maximum heat input rating of General Electric LM-5000 gas-fired turbine engine shall not exceed 457.8 MMBtu/hr and nominal generator output shall not exceed 48.5 MW. [District NSR Rule] Federally Enforceable Through Title V Permit
41. Unfired heat recovery steam generator shall not be designed for supplementary firing. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Gas turbine engine shall be equipped with continuously recording fuel gas flowmeter. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Installed SCR unit shall provide space for additional catalyst if source operation cannot achieve sampling limits. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Steam produced at this facility for use in oil production operations shall affect only wells connected to well vent vapor recovery systems approved by District. [District NSR Rule] Federally Enforceable Through Title V Permit
45. 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 and District Rule 2520] 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.

46. 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 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
47. Audits of monitors shall be conducted semi-annually by independent laboratory in accordance with EPA guidelines, witnessed by District, and reports shall be submitted to District within 30 days of such audit. [District NSR] Federally Enforceable Through Title V Permit
48. A written record of the compliance demonstrations for NOx and CO daily emissions limits, as required in the condition above, shall be maintained and made available for District inspection for a period of two years. [District NSR Rule]
49. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
50. Within 6 months of this renewed Title V permit being issued, the permittee shall apply for, and fully implement, an Authority to Construct to reduce the pre-control potential to emit for VOC emissions to a level not greater than the major source threshold; or submit a Compliance Assurance Monitoring plan for VOC emissions pursuant to the requirements of 40 CFR Part 64. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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



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# APPENDIX D

## Detailed Summary List of Facility Permits

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### Detailed Facility Report

For Facility=1250

Sorted by Facility Name and Permit Number

BADGER CREEK LIMITED HEAVY OIL CENTRAL OILFIELD RD, CA	FAC # S 1250	TYPE: TOXIC ID: 50012	EXP. DATE: 03/31/2019
STATUS: A	TELEPHONE: 8053936885	AREA: 88 /	INSP. DATE: 06/19

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-1250-1-13	48 MW cogeneration	3020-08A G	1	11,715.00	11,715.00	A	48.5 MW COGENERATION SYSTEM WITH SCR INCLUDING STEWART & STEVENSON GE MODEL 5000 GAS-FIRED TURBINE, HEAT RECOVERY STEAM GENERATOR, AND INLET AIR ABSORPTION CHILLER AND HEAT EXCHANGER

Number of Facilities Reported: 1

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation  
Badger Creek Limited  
S-1250**

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Gas Turbine Cogeneration Facility**

**Engineer:** Silvana Procopio  
**Date:** August 8, 2019

**Facility Number:** S-1250  
**Facility Name:** Badger Creek Limited  
**Mailing Address:** 34759 Lencioni Ave.,  
Bakersfield, CA 93308

**Contact Name:** Kristine Boyer  
**Phone:** 661.387.7828

**Responsible Official:** Edward Capehart  
**Title:** Plant Manager

**Project # :** S-1181428  
**Deemed Complete:** April 24, 2018

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**I. PROPOSAL**

Badger Creek Limited was issued a Title V permit on October 22, 2004. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

Additionally, the applicant is requesting the correction of condition #25 on permit S-1250-1-13, which reads as follows:

- *Unfired heat recovery boiler shall be equipped with continuously recording NOx emissions monitors (CEMS) located ahead of SCR catalyst and continuously recording NOx, CO, and O2 emissions monitors located in boiler exhaust stack. CEMS shall meet the performance specification requirements in 40 CFR Part 60, Appendix B, 40 CFR Part 51, Appendix P, and Part 60, Appendix B, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the U.S. EPA. CEMS data can be used to determine compliance with emission limits. Continuous emission monitoring for NOx, CO, and O2 serving the*

*exhaust gas stream shall conform to District Rule 1080. [District Rule 1080, 4.0 and 5.0; District NSR Rule, District Rule 4703; 40 CFR 60.13]*

The applicant argues that 40 CFR Part 75 – Continuous Emission Monitoring (CEM) - does not provide for monitoring prior to the catalyst, only afterwards. Since this condition is an NSR condition, an ATC application shall be submitted for its modification. Therefore, no further action will be taken during this Title V renewal project.

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**

Badger Creek Limited is located at 535 Fano Ave., in Bakersfield, CA.

## **III. EQUIPMENT LISTING**

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

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## **IV. GENERAL PERMIT TEMPLATE USAGE**

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

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

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

## V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review:

- Conditions 1 through 40 of the requirements for permit unit S-1250-0-4.

All other federally enforceable conditions in this Title V permit will be subject to EPA and public review.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated

- District Rule 2020, Exemptions (amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended February 18, 2016)

The following regulation has been amended after the last permit renewal; however, the amended sections do not apply, as explained in Section VIII – Permit Requirements:

- 40 CFR Part 60, Subpart A

## B. Rules Removed

There are no applicable rules that were removed since the last Title V renewal.

## C. Rules Added

There were no applicable rules added since the last Title V renewal.

## D. Rules Not Updated

The following rules have not been amended since the last renewed Title V permit was issued. The most recent date reflects the version that has been approved by the EPA into SIP.

- 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 2410, Prevention of Significant Deterioration (amended June 16, 2011)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particular Matter – Emission Rate (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4703, Stationary Gas Turbines (amended September 20, 2007)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- 40 CFR 60 Subpart GG, Standards of Performance for Stationary Gas Turbines (amended February 27, 2014)
- 40 CFR 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines (amended July 6, 2006)
- 40 CFR 64, Compliance Assurance Monitoring (CAM) (amended October 22, 1997)



## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

### A. Rules Added/Updated

No rules that are not federally enforceable were added.

### B. Rules Not Updated

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

## VIII. PERMIT REQUIREMENTS

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

### A. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any 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 (NSR)**

District Rule 2201 has been amended since this facility's initial Title V permit was issued. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit.

Various permits:

Several permits for this facility referenced "NSR Rule" instead of "Rule 2201" in the rule reference section of the permit conditions. In accordance with current District practice, "NSR Rule" has been replaced facility wide with "District Rule 2201."

**C. 40 CFR Part 60 Subpart A- Standards Of Performance For New Stationary Sources**

Parts of this regulation were amended since the facility's last Title V renewal but those amendments do not apply to the permit units included in this renewal. No further discussion is necessary.

**D. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)**

40 CFR Part 64 requires Compliance Assurance Monitoring 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

**S-1250-1-13: 48.5 MW COGENERATION SYSTEM WITH SCR INCLUDING STEWART & STEVENSON GE MODEL 5000 GAS-FIRED TURBINE, HEAT RECOVERY STEAM GENERATOR, AND INLET AIR ABSORPTION CHILLER AND HEAT EXCHANGER**

This permit unit has been previously determined to be subject to CAM for VOC under the latest Title V renewal (Project # S-1133732). It was also determined under that project that the unit was exempt from CAM requirements for NO<sub>x</sub> and CO because it has continuous emission monitors (CEMS) for these pollutants.

The applicant had been required to submit a CAM plan within 6 months from the last Title V renewal (dated August 2014). On April 13, 2015 the District received their CAM plan, which meets the monitoring requirements of §64.5 and the reporting and recordkeeping requirements of §64.9. Therefore, current permit condition #50 will be deleted from the permit since it is no longer applicable.

The following permit conditions – already included in the current PTO- will now reference 40 CFR Part 64 in order to ensure compliance with the federal requirements of this part:

*1. Compliance with permit conditions in the Title V permit shall be deemed compliance with following subsumed requirements: Rule 108 (San Joaquin), Rule 108.1 (San Joaquin), and Rule 407 (San Joaquin) as of the date of permit issuance. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a), (a)(1), (a)(2), (b), and (f); 60.333 (a) and (b); 60.334(a), (b)(2), and (c); and 60.335(b) and (c); 60.7 (b), 60.8, 60.13, and 64; District Rule 1080 (as amended December 17, 1992), Sections 6.3, 6.4, 6.5, 7.0, 7.1, 7.2, 7.3, 8.0, 9.0, 10.0, and 11.0; and District Rule 1081 (as amended December 16, 1993) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520]*

*21. Inlet gas temperature to catalyst bed shall be maintained within range recommended by catalyst manufacturer except during periods of startup and shutdown as defined in this permit. [District Rule 2201 and 40 CFR Part 64]*

*32. Records shall be maintained and shall contain the occurrence and duration 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, maintenance of any CEMS that have been installed pursuant to District Rule 1080; emission measurements; and daily actual local startup and stop time, length and reason for reduced load periods, daily and total hours of operation and quantity of fuel used. [District Rules 1080, 2201, and 4703; 40 CFR Parts 60.332(a), (b); 60.7(b); and 64]*

*34. Operators of CEMS shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken, and preventive measures adopted; averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; applicable time and date of each period during which the CEMS 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. For clarification, operator shall use the same averaging periods as written into the permit for demonstrating compliance. [District Rule 1080 and 40 CFR Parts 60.7(c) and 64]*

The following conditions – already included in the current PTO- will be modified to better describe the federal requirements under 40 CFR Part 64:

Current condition #36:

*Gas temperature at SCR catalyst section inlet shall be monitored by an operational temperature indicator. [District Rule 2201]*

Modified condition #39:

*Gas temperature at SCR catalyst section inlet shall be monitored by an operational temperature probe located in the exhaust stack after the SCR catalyst at the oxidation catalyst inlet. [District Rule 2201 and 40 CFR Part 64]*

Current condition #37:

*The operator shall monitor and record exhaust gas temperature at oxidation catalyst inlet. [District Rule 2201]*

Modified condition #40:

*The operator shall continuously monitor and record exhaust gas temperature at oxidation catalyst inlet. [District Rule 2201 and 40 CFR Part 64]*

The following permit conditions will be added to the permit in order to ensure compliance with the federal requirements of 40 CFR Part 64:

- *Monitoring of the exhaust gas temperature at the inlet to the CO catalyst and the CO concentration measured by the CEMS shall be used as performance indicators of compliance with the VOC emissions limits. [40 CFR Part 64]*
- *The exhaust gas temperature at the inlet of the CO catalyst shall be kept within the following range: between 760 F and 930 F. Any exceedance to this range shall trigger a, inspection, corrective action and reporting requirements. [40 CFR Part 64]*
- *Trained personnel shall perform inspections, calibration, and maintenance of the temperature measurement system to ensure the continuing validity of the data. [40 CFR Part 64]*
- *A computerized data acquisition system shall be used to collect temperature and CO concentration every 1 second, which will be reduced to a 1-hour average temperature and 1-hour average CO concentration, respectively. [40 CFR Part 64]*

## **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**

#### Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shield as granted in Model General Permit Template is included as conditions 39 and 40 of the facility-wide requirements (S-1250-0-4).

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

The applicant has not requested any permit shields for any requirements not addressed by model general permit templates.

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

Existing rules under permit condition #40 of facility-wide permit S-1250-0-1 have not been amended since the last Title V renewal. Therefore, there will be no changes to condition #40.

References to 40 CFR Part 60 in permit condition #1 of S-1250-1-13 have been updated to reflect amendments done to the federal requirements after the last Title V renewal.

## **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.

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## **XI. PERMIT CONDITIONS**

See Appendix A - Draft Renewed Title V Operating Permit.

## **APPENDICES**

- A. Compliance Assurance Monitoring (CAM) Plan
- B. Draft Renewed Title V Operating Permit
- C. Previous Title V Operating Permit
- D. Detailed Summary List of Facility Permits