



JUL 14 2017

Mr. Terry Coble
Covanta Stanislaus, Inc
4040 Fink Road
Crows Landing, CA 95313

**Re: Notice of Final Action - Title V Permit Renewal
District Facility # N-2073
Project # N1153508**

Dear Mr. Coble:

The District has issued the Final Renewed Title V Permit for Covanta Stanislaus, Inc (see enclosure). The preliminary decision for this project was made on February 1, 2017. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

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

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

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Sayed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

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

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TITLE V PERMIT RENEWAL EVALUATION

Municipal Solid Waste Cogeneration Plant

Engineer: James Harader
Date: July 3, 2017

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

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

Responsible Official: Jeff Ruoss
Title: Plant Manager

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

I. PROPOSAL

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

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

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

II. FACILITY LOCATION

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

III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

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

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

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

V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

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

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

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

District Rule 2020, Exemptions

(as amended August 18, 2011 → December 18, 2014)

District Rule 2201, District New and Modified Stationary Source Review Rule

(as amended April 21, 2011 → February 18, 2016)

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

District Rule 4702, Internal Combustion Engines

(as amended August 8, 2011 → November 14, 2013)

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

(as amended January 28, 2009 → February 27, 2014)

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

(as amended June 30, 2010 → February 27, 2014)

40 CFR 82 Subparts B, Stratospheric Ozone

(as amended June 25, 2013)

40 CFR 82 Subpart F, Stratospheric Ozone

(as amended April 10, 2015)

B. Rules Removed

None

C. Rules Added

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

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

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

D. Rules Not Updated

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

40 CFR 68, Chemical Accident Prevention Provisions
(as amended April 9, 2004)

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

A. Rules Added

No rules have been added.

B. Rules Not Updated

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

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

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

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

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

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

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

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

VIII. PERMIT REQUIREMENTS

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

A. District Rule 2020 – Exemptions

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

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

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

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

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

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

C. District Rule 2401 – Prevention of Significant Deterioration

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

D. District Rule 2520 – Federally Mandated Operating Permits

Greenhouse Gas Requirements

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

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

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

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

Rule 4352 Requirements	Method of Compliance									
Section 5.1 Table 1 includes the following NOx and CO emission limits for municipal solid waste-fired boilers: <table><tr><th colspan="3">Rule 4352 Table 1 – NOx and CO Emission Limits</th></tr><tr><th>Fuel Type</th><th>NOx Limit</th><th>CO Limit</th></tr><tr><td>Municipal Solid Waste</td><td>165 ppmv corrected to 12% CO₂</td><td>400 ppmv corrected to 3% O₂</td></tr></table>	Rule 4352 Table 1 – NOx and CO Emission Limits			Fuel Type	NOx Limit	CO Limit	Municipal Solid Waste	165 ppmv corrected to 12% CO ₂	400 ppmv corrected to 3% O ₂	Source testing indicates that the municipal solid waste combustors are operating in compliance with these limits. Condition #22 of the existing PTO (N-2073-1-14) limits the CO emissions to 100 ppmvd @ 7% O₂, which is equivalent to 42.9 ppmvd @ 3% O₂. Therefore, the current permit condition complies with Rule 4352, and will be included as condition #22 of the draft TV PTO (N-2073-1-16). Condition #102 of the existing PTO (N-2073-1-14) limits the NOx emissions to 165 ppmvd @ 12% CO₂ on a block 24-hour average. Therefore, the current permit condition complies with Rule 4352, and will be included as condition #104 of the draft TV PTO (N-2073-1-16). A Rule 4352 reference has been added to the condition.
Rule 4352 Table 1 – NOx and CO Emission Limits										
Fuel Type	NOx Limit	CO Limit								
Municipal Solid Waste	165 ppmv corrected to 12% CO ₂	400 ppmv corrected to 3% O ₂								
Section 5.2 states that all NOx and CO emission limits shall be based on a block 24-hour average. A violation of the emission limits as measured by the test methods listed in Section 6.3 shall constitute a violation of this Rule.	Condition #22 of the existing PTO (N-2073-1-14) limits CO emissions based on a four hour rolling average, which is more stringent than a block 24-hour average. This condition has been included as condition #22 of the draft TV PTO (N-2073-1-16) Condition #102 of the existing PTO (N-2073-1-14) limits the NOx emissions to 165 ppmvd @ 12% CO₂ on a block 24-hour average. Therefore, the current permit condition complies with Rule 4352, and will be included as condition #104 of the draft TV PTO (N-2073-1-16). A Rule 4352 reference has been added to the condition.									
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Rule 4352 Requirements	Method of Compliance
Section 5.3 states that the emission limits of Section 5.1 do not apply during start-up or shutdown provided an operator complies with the following: 1. The duration of each shut down shall not exceed 12 hours; 2. The duration of each start-up shall not exceed 96 hours. 3. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shut down.	Condition #120 of the current PTO (N-2073-1-14) enforces this requirement. The condition language has been modified to clarify that the exemption from emission limits during start-up and shut down does not apply to emission limitations that are based on other requirements, such as 40 CFR, NSR, or PSD. The revised condition is included as Condition #120 on the draft TV PTO (N-2073-1-16).
Section 5.4 states that the owner/operator of any unit using ammonia injection as a NO_x control technique shall operate a Continuous Emissions Monitoring System (CEM) to monitor and record NO_x concentrations, CO₂ or O₂ concentrations, as well as the NO_x emission rate. The Continuous Emission Monitoring Systems shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7(c) and 60.13. CEMs must also satisfy the Performance Specifications of 40 CFR 60 Appendix B and Relative Accuracy Test Audit of Appendix F.	Conditions #67 and #70 of the current permit (N-2073-1-14) enforce these requirements. These conditions have been retained as conditions #67 and #70 on the draft TV PTO (N-2073-1-16).
Section 6.1.1 lists recordkeeping requirements for all units except for municipal solid waste (MSW) fired units. Section 6.1.2 requires those records to be kept for five years, and made available to the APCO, ARB, and EPA upon request.	Since this project only involves MSW fired units, the requirements of these sections are not applicable.
Section 6.2.1 requires each combustion unit to be tested at least once every 12 months to determine compliance with the NO_x and CO emission limits of the Rule.	Condition #78 of the current PTO (N-2073-1-14) enforces this requirement. The condition has been included on the draft TV PTO (N-2073-1-16), as condition #78, and a rule 4352 reference has been added to the condition.
Section 6.2.2 requires that all emission measurements be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate	Condition #79 of the draft TV PTO (N-2073-1-16) has been added to enforce this requirement.
Section 6.2.3 requires that no compliance determination be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 3 minutes or longer.	Condition #80 of the draft TV PTO (N-2073-1-16) has been added to enforce this requirement.
Section 6.3 requires the following test methods be utilized for compliance with the emission limits of Section 5.0: • Oxides of Nitrogen – EPA Method 7E or ARB Method 100 • Carbon Monoxide – EPA Method 10 or ARB Method 100 • Stack gas oxygen – EPA Method 3 or 3A or ARB Method 100 • Stack Gas Velocities – EPA Method 2	Conditions #22 and #23 of the current PTO (N-2073-1-14) enforce these requirements. These conditions have been retained on the draft TV PTO (N-2073-1-16) as conditions #22 and #23.

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

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

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

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

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

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

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

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

G. District Rule 4702 – Internal Combustion Engines

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

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

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

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

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

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

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

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

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

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

40 CFR 60 Subpart III Requirement	Method of Compliance
40 CFR 60.4205(c) states that the owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in Table 4 of this subpart for all pollutants. Pursuant to Table 4 of the subpart, the following emission standards are applicable to the 175 BHP IC engine, which was manufactured after 2009: NMHC + NOx: 3.0 g/bhp-hr PM: 0.15 g/bhp-hr	Conditions #5 and #6 of ATC N-2073-4-0 enforce this requirement. These conditions have been included on the draft TV PTO (N-2073-4-1) as conditions #5 and #6.
40 CFR 60.4207(b) requires the engine to use fuel that meets the requirements of 40 CFR 80.510(b). Section 80.510(b) requires the use of diesel fuel that meets the following standards: 1. Sulfur content of 15 ppm for NR diesel fuel or 500 ppm for LM diesel fuel. 2. A minimum Centane index of 40 or a maximum aromatic content of 35 volume percent	The use of California reformulated diesel fuel ensures compliance with this requirement. Condition #4 of ATC N-2073-4-0 requires the use of CARB certified diesel fuel. This condition is included on the draft TV PTO (N-2073-4-1) as condition #4.
40 CFR 60.4209(a) requires the operator to install and operate a non-resettable hour meter prior to operation of the engine. 60 CFR 60.4209(b) requires engines equipped with diesel particulate filters to install a backpressure monitor.	The engine is not equipped with a diesel particulate filter. Condition #3 of ATC N-2073-4-0 enforces the requirement to install a non-resettable hour meter. This condition is included on the draft TV PTO (N-2073-4-1) as condition #3.
40 CFR 60.4211(a) states that the owner/operator must: 1. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission related written instructions; 2. Change only those emission related settings that are permitted by the manufacturer; and 3. Meet the requirements of 40 CFR Parts 89, 94, and/or 1068 as they apply.	Condition #7 of ATC N-2073-4-0 enforces this requirement. This condition has been included on the draft TV PTO (N-2073-4-1) as condition #7.
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40 CFR 60.4211(c) requires the owner or operator to install an EPA certified engine.	The applicant has installed an EPA Tier 3 Certified engine meeting the emission standards; therefore, compliance is expected.
40 CFR 60.4211(f) requires engines to not exceed 100 hours of operation per calendar year for maintenance checks and readiness testing and do not limit emergency operation of the engine powering a fire pump.	Condition #9 of ATC N-2073-4-0 enforces this requirement. This condition has been included on the draft TV PTO (N-2073-4-1) as condition #9.
40 CFR 60.4214(b) requires the owner and operator keep records of emergency and non-emergency usage of the engine, recorded through the non-resettable hour meter, and the reason the engine was in operation.	Conditions #10 and #12 of ATC N-2073-4-0 enforce this requirement. This conditions have been included on the draft TV PTO (N-2073-4-1) as conditions #10 and #12.

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

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

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

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

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

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

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

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

L. 40 CFR Part 64 – CAM

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

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

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

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

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

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

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

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

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

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

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

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

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

This unit is not equipped with any add-on controls; therefore, the unit is not subject to any CAM requirements.

IX. PERMIT SHIELD

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

A. Requirements Addressed by Model General Permit Templates

The following permit shields were issued via the 0-3 umbrella template:

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

N-2073-0-3, Condition 40: *Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2]*

B. Requirements not Addressed by Model General Permit Templates

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

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

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

Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	SJVAPCD Reg. II, Rule 2250	This rule is not applicable since CSI does not operate portable equipment as defined in this Rule	N	A permit shield has not been granted, for the same reason that the request for a District Rule 2201 permit shield was not granted.
All Sources	SJVAPCD Reg. II, Rule 2280	This rule is not applicable since CSI does not operate portable equipment as defined in the Rule	N	A permit shield has not been granted, for the same reason that the request for a District Rule 2201 permit shield was not granted.
All Sources	SJVAPCD Reg. II, Rule 2520	Compliance with this rule (as are applicable to CSI) is by way of this Title V Renewal Application Submittal	N	The requirement to submit a TV renewal is only one component of compliance with District Rule 2520 requirements; furthermore, that requirement is periodic and the submittal of the current Title V renewal does not ensure future compliance with the Rule requirement. Therefore a permit shield has not been granted for this request.
All Sources	SJVAPCD Reg. II, Rule 2530	This rule is not applicable since CSI is not opting to take federally mandated enforceable emission limits	N	The District does not grant permit shields for District Rule 2530 requirements; therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. II, Rule 2540	CSI is exempt from this regulation because the sources are not regulated under Part 72, Title 40 CFR	N	The District does not grant permit shields for Acid Rain requirements; therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. II, Rule 2550	This rule is not applicable since CSI has not applied to construct or reconstruct a Major Air Toxics source as defined in Rule	N	The provided basis doesn't demonstrate conclusively that the facility is not a Major Toxics Source; therefore a permit shield has not been granted.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	SJVAPCD Reg. II, Rule 4001 – New Source Performance Standards	Compliance with this rule is by way of compliance with all applicable federal regulations identified in this permit application submittal.	N	District Rule 4001 references multiple Subparts of 40 CFR 60, as in effect on April 14, 1999. Since the District does not issue blanket permit shields and this rule references multiple subparts, a permit shields has not been granted.
All Sources	SJVAPCD Reg. II, Rule 4002 – National Emission Standards for Hazardous Air Pollutants	Federal Regulations (40 CFR 61) that are incorporated by reference are not applicable to the CSI facility because the facility does not meet the definitions contained in these regulations.	N	District Rule 4002 references multiple Subparts of 40 CFR 63, as in effect on May 20, 2004. Since the District does not issue blanket permit shields and this rule references multiple subparts, a permit shields has not been granted.
All Sources	SJVAPCD Reg. IV, Rule 4105	CSI is exempt from this regulation because the sources do not meet the definition of a disposal facility contained in this Rule	N	The basis provided by the applicant does not provide enough detail to make a conclusive determination that District Rule 4105 is not applicable. Therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. IV, Rule 4106	CSI is exempt from this regulation because the sources do not meet the definition for conducting prescribed burning.	Y	The CSI facility is exempt from this regulations since they do not perform prescribed burning and hazard reduction burning in a wildland or urban interface. Therefore, a permit shield has been granted. See condition #47 of Draft TV PTO N-2073-0-3.
All Sources	SJVAPCD Reg. IV, Rule 4204	CSI is exempt from this regulation because the sources don't meet the definition of operating a cotton gin	Y	CSI does not own/operate a cotton ginning facility; therefore, District Rule 4204 requirements do not apply to this facility and a permit shield has been granted. See condition #48 of Draft TV PTO N-2073-0-3.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
All Sources	SJVAPCD Reg. IV, Rule 4302 Incinerator Burning	Applicable rule contains no applicable requirements.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
Boilers/ Combustors	SJVAPCD Reg. IV, Rule 4305 and Rule 4351	CSI Boilers are exempt from these regulations because the sources meet the definition of units fired with solid fuel as exempted under sections 4.1.1 and 4.1.2 respectively	Y	As stated by the provided basis, District Rules 4305 and 4351 are not applicable to solid fuel-fired units such as those operated at this facility. Therefore, a permit shield has been granted. See Conditions #129 and #130 of draft TV PTO N-2073-1-16.
Boilers/ Combustors	SJVAPCD Rule 4352, items 6.1 and 7.12 – Emission Control Plan and Demonstrate Compliance	Compliance with this rule has been demonstrated through reporting of compliance testing on file with the SJVAPCD as of October 19, 2015	Y	The permittee has satisfied the requirements of Sections 6.1 and 7.12 of District Rule 4352 and all of the applicable provisions of District Rule 4352 are included on the permits for the combustor. Therefore, a permit shield has been granted. See Condition #131 of draft TV PTO N-2073-1-16.
Mobile Vehicles and Mobile Equipment Coating Operations	SJVAPCD Reg IV Rule 4602: Mobile vehicles and mobile equipment coating operations	CSI only conducts touch up coating operations which is exempt from Rule 4602 per item 4.1.1.	N	The current version of District Rule 4602 does not include a Section 4.1.1. Since the provided basis for the permit shield is not valid, a permit shield has not been granted.
Storage of Organic Liquids	SJVAPCD Reg IV, Rule 4623 Storage of Organic Liquids	Only certain sections of this rule apply to CSI because the organic liquids, including petroleum distillates stored at CSI do not have a true vapor pressure of greater than 0.5 psia per item 4.4.	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.

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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
Organic Liquid Loading	SJVAPCD Reg. IV, Rule 4624 Organic Liquid Loading	This rule does not apply to CSI because the organic liquids, including petroleum distillates, stored at CSI do not have a true vapor pressure greater than 1.5 psia per item 4.3	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
All Sources	SJVAPCD Reg. IV, Rule 4625 – Waste Water Separators	There are no sources of this type at the CSI Facility	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
Organic Solvents	SJVAPCD Reg. IV, Rule 4625 – Waste Water Separators	There are no sources of this type at the CSI Facility	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
Organic Solvent Degreasing Operations	SJVAPCD Reg. IV, Rule 4662 Organic Solvent Degreasing Operations	CSI does not use degreasers regulated in this rule	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
IC Engine serving Fire Pump	SJVAPCD Reg. IV, Rule 4701 Internal Combustion Engines	The IC engine is exempt from Rule 4701 per Item 4.2.2. Engine is used exclusively for firefighting purposes	Y	The IC engine is only exempt from a portion of the rule requirements; however, All applicable rule requirements are included on the permit. Therefore, a permit shield has been granted. See Condition #13 of draft TV PTO N-2073-4-1.
IC Engine serving Fire Pump	SJVAPCD Reg. IV, Rule 4702 Internal Combustion Engines	The IC engine is exempt from Rule 4702 per item 4.3 (except certain recordkeeping requirements). The engine is used exclusively for firefighting purposes	Y	The IC engine is only exempt from a portion of the rule requirements; however, All applicable rule requirements are included on the permit. Therefore, a permit shield has been granted. See Condition #14 of draft TV PTO N-2073-4-1.
All Sources	SJVAPCD Reg IV, Rule 4802 Sulfuric Acid Mist	CSI does not meet the definition of a manufacturer of sulfuric acid.	Y	The boilers/combustors not meet the definition of a sulfuric acid production unit; therefore, a permit shield has been granted for the boilers/combustors. See Condition #132 of draft TV PTO N-2073-1-16.
All Sources	SJVAPCD Reg VI – Air Pollution Emergency Contingency Plan	Regulations applies to SJVAPCD on episode procedures and alerts	N	Some regulation VI requirements, such as the requirements of Rule 6130 may apply to the facility in the event of a Stage 1, 2, or 3 air pollution event. Since the facility is not exempt from such requirements and since the requirements are not included on the proposed TV PTO, a permit shield cannot be granted.
All Sources	SJAPCD Reg. VII Rule 7011 Hexavalent Chromium	The CSI facility does not meet the definition or conduct this type of activity	N	The Clean Air Act allows permit shields to be issued on the basis that all requirements are included in the Title V permit or the sources are exempt from the provisions. Neither of those criteria are satisfied by the applicant's provided basis for the permit shield; therefore, a permit shield has not been granted.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
Cooling Towers	SJVAPCD Reg VII, Rule 7012	No cooling water additives containing hexavalent chromium are used at this facility	Y	Condition #91 of the Draft Title V PTO (N-2073-1-16) ensures cooling water additives containing hexavalent chromium are not utilized. Therefore, the cooling tower is exempt from Rule 7012 requirements and a permit shield has been granted. See Condition #133 of draft TV PTO N-2073-1-16.
Fugitive Dust	SJVAPCD Reg VIII, Rule 8011- General Requirements	Regulation is not applicable since no other SJVUAPCD REG VII are applicable to the CSI facility.	N	The applicant requested the use of the umbrella template, which includes permit requirements for potentially applicable Regulation VIII requirements.
Construction, Demolition, Excavation, and Extraction Activities	SJVAPCD Reg VIII, Rule 8021 – Construction, demolition, excavation, extraction, and other earthmoving activities	No such activities occur at CSI	Y	Such activities could occur at this facility; therefore, a permit shield cannot be granted for the provided basis. However, the applicant also requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, A permit shield was granted for this rule based on the umbrella template.
Handling and Storage of Bulk Materials	SJVAPCD Reg VIII, Rule 8031 – Bulk Materials	All handling of bulk materials occur within an enclosed structure, materials are sufficiently moist, and materials do not contain a silt content > 5%.	Y	The applicant also requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, A permit shield was granted for this rule based on the umbrella template.
Carryout – Trackout	SJVAPCD Reg VIII, Rule 8041- Carryout and Trackout	CSI is exempt since no carryout/trackout falls on public roads per section 3.8 of Rule 8041	Y	The applicant also requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, A permit shield was granted for this rule based on the umbrella template.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
Open Areas	SJVAPCD Reg VIII, Rule 8051 - Open Areas	The CSI is exempt since it has not open areas as specified in Section 2.0 greater than 3.0 acres.	Y	The applicant also requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, A permit shield was granted for this rule based on the umbrella template.
Paved and Unpaved Roads	SJVAPCD REG VIII Rule 8061 – Fugitive Dust Requirements	Applies only to affected activities constructed or modified after December 10, 1993. Affected activities at CSI commenced prior to this date.	Y	The applicant also requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, A permit shield was granted for this rule based on the umbrella template.
Unpaved Vehicle/ Equipment Traffic Areas	SJVAPCD Reg VIII, Rule 8071 – Fugitive Dust Requirements	Affected areas are less than one (1) acre and less than 50 average annual daily trips (AADT)	Y	The applicant also requested the utilization of the Umbrella Template, which includes conditions for complying with this rule and includes a permit shield for this rule. Thus, A permit shield was granted for this rule based on the umbrella template.
Boilers/ Combustors	Health Risk Assessment Referenced in this permit to operate is the HRA conducted by Radian and CSI submitted August 1986 and approved by the California Department of Health Services	Only the most recent DHS approved health risk assessment associated with operation of the WTE at Crows Landing California is applicable to this operating permit	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield from; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
All Sources	SJVAPCD Regulations or Portions thereof not explicitly listed in this Title V Renewal Application	Regulations for which require an action by the "APCO", "District", "EPA", or any other government agency are requirements applying to the government agency and not requirements applied to the CSI facility.	N	This request doesn't adequately identify the specific regulation the applicant is requesting a permit shield for; therefore, the District is unable to determine whether the TV permit includes all the applicable requirements of the regulations or if the sources are exempt from the regulations.
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Sources for Permit Shield	Regulation For Which Applicant is Requesting a Permit Shield	Applicant's provided basis for Permit Shield	Permit Shield Issued? (Y/N)	District's Basis for Granting/Denying Permit Shield
IC engine serving generating set under Permit No. N-3817-1-0	Not subject to this Title V renewal application or Permit to Operate	This IC engine source is not located at the same contiguous property as CSI facility ID N-2073. In addition, this source with assigned facility ID 3817 is not a Major Source and not subject to Title V operating permit program. [Reference: Chris Valverde of the SJVAPCD, Feb 25, 1997]	N	This request doesn't identify any specific regulation the applicant is requesting a permit shield for; therefore, a permit shield was not granted.
All Sources	Demonstration of Compliance for permit conditions contained in the compliance plan	Compliance with each listed permit condition contained in the CSI compliance plan – Form TV 004 will be demonstrated via permit conditions that specifically outline monitoring, reporting, and recordkeeping protocols and via referenced federal compliance methods. [Martin Keast of the SJVAPCD – March 5, 1997]	N	This request doesn't identify any specific regulation the applicant is requesting a permit shield for; therefore, a permit shield was not granted.
All Sources	Demonstration of Compliance with outdated SIP requirements	Compliance with permit conditions in the Title V permit shall be deemed compliance with all the following outdated SIP requirements: Stanislaus County Rules 108, 108.1, 110, 201, 202, 203, 204, 208, 209, 401, 404, 405, 406, 408, 417, 422, and 423. A permit shield is granted from these requirements per SJVAPCD Rule 2520 Section 13.2.	N	The provided basis isn't adequate for granting a Permit Shield.
All Sources	State only designated permit conditions	Permit conditions that are identified as state only are not federally enforceable. Some federally enforceable conditions listed in the applicable requirements section of this Title V renewal have state only components that are not federally enforceable.	N	This request doesn't identify any specific regulation the applicant is requesting a permit shield for; therefore, a permit shield was not granted.

C. Obsolete Permit Shields From Existing Permit Requirements

None of the existing permit shields were determined to be obsolete.

X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit

XI. ATTACHMENTS

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

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-2073-0-3

EXPIRATION DATE: 10/31/2016

FACILITY-WIDE REQUIREMENTS

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; Stanislaus County Rule 110; and PSD SJ 86-03] 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; Stanislaus County Rule 110; and PSD SJ 86-03] 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. 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 9.12.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: COVANTA STANISLAUS, INC
Location: 4040 FINK RD, CROWS LANDING, CA 95313
N-2073-0-3: Jan 3 2017 2:23PM - HARADERJ

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7 and PSD SJ 86-03] 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. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4 and PSD SJ 86-03] 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 Stanislaus County Rule 401] 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. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit
34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation) [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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. In the event of changes in control or ownership, this Operating Permit shall be binding on new owners and operators. The applicant shall notify successor of the existence of this Operating Permit and its conditions in writing and forward a copy to the District, California Air Resources Board, and EPA. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
42. The applicant shall construct and operate the facility in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State and District air quality regulations. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
43. All correspondence as required by this Operating Permit shall be forwarded to: the District; Director, Air & Toxics Div. (Attn: A-3-3), EPA Region 9, 75 Hawthorne St. San Francisco, CA 94105; and Director, Stationary Source Div., CARB, Box 2815, Sacramento, CA 95812. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
46. Compliance with permit conditions in the Title V permit shall be deemed compliance with following applicable requirements: 40 CFR 82 Subparts A, B, C, D, E and F. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. A permit shield from the requirements of District Rule 4106 (6/11/2001) is granted since this facility does not perform prescribed burning nor does the facility perform hazard reduction burning in a wildland or urban interface. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. A permit shield from the requirements of District Rule 4204 (2/17/05) is granted since this facility does not meet the definition of a cotton ginning facility. [District Rule 2520, 13.2] 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.

49. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1st 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: N-2073-1-16

EXPIRATION DATE: 10/31/2016

EQUIPMENT DESCRIPTION:

TWO 400 TON/DAY MUNICIPAL SOLID WASTE COMBUSTOR/BOILERS PRODUCING 21.5 MW OF ELECTRICITY EQUIPPED WITH DRY LIME SCRUBBERS, FLY ASH BAGHOUSE, AMMONIA INJECTION SYSTEM, LIME SLURRY INJECTION, ACTIVATED CARBON INJECTION SYSTEM, LIME AND SODA AND CARBON SILOS WITH FILTER VENTS, WASTE RECEIVING, ASH CONVEYING, AND ASH RESIDUE ENCLOSURE

PERMIT UNIT REQUIREMENTS

1. All equipment, facilities and systems installed or used to comply with the terms and conditions of this Permit to Operate shall be maintained in good working order and be operated as required to meet the conditions of this permit. Operator shall, on each boiler, continuously operate and maintain the following air pollution controls to minimize emissions: baghouse for the control of particulates; lime slurry dry scrubber for the control of SO₂ and acid gas emissions; and ammonia injection system for the control of NO_x emissions. [District Rule 2080 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
2. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. The baghouse shall have a maximum effective air-to-cloth ratio of 4:1 and shall be equipped with an automatic cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest individual combustion unit baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from any location other than designated vents on refuse receiving, processing or storage buildings at any time, except as provided in this permit to operate. Visible emissions shall be inspected quarterly under material and environmental conditions, such as dry and windy, where high emissions are expected. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
6. Paved areas shall be kept free of visible dust at all times and shall be vacuum swept at least once every fourteen days. Records of vacuum sweeping shall be maintained and made available to the District upon request. [District Rule 4102]
7. The NO_x control system shall be in full use whenever this equipment is fired with MSW. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The total PM₁₀ emissions from the ash handling system (including ferrous and non-ferrous material recovery operations) inside the ash enclosure shall not exceed 1.2 pounds in any one day and 402 pounds in any rolling 12 consecutive month period. The permittee shall maintain records sufficient to demonstrate compliance with these limits. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The PM₁₀ emissions from the non-ferrous material recovery equipment in the ash enclosure shall not exceed 183 pounds in any rolling 12 consecutive month period. The permittee shall maintain records sufficient to demonstrate compliance with this limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [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. The ash shall be handled in such a manner as to mitigate fugitive emissions to the maximum extent possible. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
11. The facility shall not cause visible emissions from ash conveying systems, including transfer points, in excess of 5% of the observation period, as determined by performing EPA Method 22 on a quarterly basis. Fugitive ash emissions do not include emissions within a building, an enclosed ash conveyor, or during periods of maintenance and repair of the ash conveyor systems. [40 CFR 60.36b] Federally Enforceable Through Title V Permit
12. Fuel Oil #2, with a sulfur content not to exceed 0.25% by weight, may be used as necessary to maintain the minimum combustion zone temperature requirements and annual usage shall not exceed 1,108,321 gallons for each combustor. [District NSR Rule, 40 CFR 60. 44b(c) & PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. A furnace roof temperature of 1,100 degrees F shall be stabilized, as measured by multiple thermocouples, to ensure that a minimum temperature of 1,800 degrees F is established above the grate prior to the ignition of MSW. [District NSR Rule] Federally Enforceable Through Title V Permit
14. During any period of time that MSW is burning on the grates, the combustion gas retention time shall be maintained at a minimum of one second, the combustion zone temperature shall be maintained at a minimum of 1,800 degrees F, and the furnace roof temperature shall be maintained at an average (4 hour arithmetic block) of 1,100 degrees F, except during periods of start-up, shutdown, and malfunction, as defined in 40 CFR 60.58b(a). [District NSR Rule] Federally Enforceable Through Title V Permit
15. Hazardous materials shall not be burned in this equipment. Hazardous materials are that portion of solid waste which, by reason of its composition or characteristics, is: (a) hazardous waste as defined in the Solid Waste Disposal Act, 42 USC section 6901 et. seq., and the regulations thereunder, the California Health & Safety Code, Div. 20, Chs. 6.5, 6.7, and 6.8 (section 25100 et. seq.), the California Code of Regulations, Title 22, Div. 4.5, and any similar or substituted legislation or regulations or amendments to the foregoing; (b) any other materials which any governmental agency or unit having appropriate jurisdiction shall determine from time to time is harmful, toxic, or dangerous, or otherwise ineligible for disposal through the facility; and (c) any material, other than residential or commercial solid waste of the type historically collected by the County and the City as acceptable for disposal into non-hazardous waste landfills, which would result in process residue being hazardous waste under (a) or (b) above. [District Rule 4102]
16. The facility shall develop and annually update a site-specific operating manual in accordance with 40 CFR 60.54b(e). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
17. Each operator and all maintenance personnel shall receive initial and annual training on the site-specific operating manual in accordance with 40 CFR 60.54b(f). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
18. The site-specific operating manual and operating manual training records shall be accessible to all operations and maintenance personnel and shall be made available to the enforcement agency upon request. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
19. The District reserves the right to require the permittee to re-evaluate the health risk assessment if there is a significant change in population locations as projected in the currently approved health risk assessment, or new health data becomes available. [District Rule 4102]
20. During any 3-hour periods of startup, shutdown, and malfunction, the facility shall be exempt from emission limits identified in this permit which are based upon 40 CFR 60 Subpart Cb or Subpart Eb. This exemption shall not apply to CO emission limits of 40 CFR 60.53b(a) if the malfunction is a loss of boiler water level control. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Opacity exhibited by the gases discharged to the atmosphere from each combustion unit, other than water vapor, shall not exceed 10 percent based on a six minute average as measured by EPA Method 9. [40 CFR 60.33b and 40 CFR Part 64] Federally Enforceable Through Title V Permit
22. The carbon monoxide (CO) emissions from each combustion unit shall not exceed 100 ppmv, dry, corrected to 7% O₂, as measured utilizing EPA Methods 1-4 and 10. Compliance with this limit shall be determined based on a four hour block arithmetic average as defined in 40 CFR 60.51b. [District Rule 4352 and 40 CFR 60.34b] 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 NO_x emissions from each combustion unit shall not exceed 200 ppmv, dry, corrected to 12% CO₂ as measured by EPA Methods 1-4 and 7E. Compliance with this limit shall be determined based on an eight rolling hour average. [District NSR Rule, District Rule 4352, and 40 CFR 60.33b] Federally Enforceable Through Title V Permit
24. Either the SO₂ emissions from each combustion unit shall not exceed 30 ppmv, dry, corrected to 12% CO₂, based on an eight hour rolling average, or the SO₂ removal efficiency shall be at least 80% as measured by EPA Methods 1-4 and 6C. The SO₂ 80% removal efficiency shall be based on the measurement of the inlet and outlet SO₂ concentrations, corrected to 12% CO₂. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The SO₂ emissions from each combustion unit shall not exceed 29 ppmv, dry, corrected to 12% CO₂, or the SO₂ removal efficiency shall be at least 75% (by weight or volume), whichever is less stringent as measured by EPA Methods 1-4 and 6C. Compliance with this limit shall be determined based on a 24-hour daily geometric mean. EPA method 19 shall be used to calculate the daily geometric average sulfur dioxide emission concentration and removal efficiency. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
26. Particulate matter emissions from each combustion unit shall not exceed 0.0275 gr/dscf, corrected to 12% CO₂, as measured by EPA Methods 1 through 5, including the condensable portion in the "back-half". [District NSR Rule] Federally Enforceable Through Title V Permit
27. Filterable particulate matter (i.e. front half) emissions from each combustion unit shall not exceed any of the following emission limits: 0.011 gr/dscf, corrected to 12% CO₂; 25 milligrams/dscf, corrected to 7% O₂; 0.10 lb/MMBtu heat input. Owner or operator shall conduct a performance test for particulate matter on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) with EPA Method 1; EPA Method 3, 3A, or 3B; and EPA Method 5. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than 160 degrees C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run. [District NSR Rule, 40 CFR 60.33b, 40 CFR 60.38b, and 40 CFR 60.43b(d)(1)] Federally Enforceable Through Title V Permit
28. Filterable particulate matter emissions from each combustion unit shall not exceed 0.008 gr/dscf, corrected to 12% CO₂, for the fraction of particles less than 2 μ in diameter, as measured by Andersen Cascade Impactor, Flow Sensor Multiclone or any other equivalent measurement as validated by EPA Method 301. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Each combustion unit shall only be allowed to emit half of the total allowable (mass) emission rate for each pollutant. [District NSR Rule] Federally Enforceable Through Title V Permit
30. The CO emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
31. The CO emissions shall not exceed 121.9 tons/yr. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
32. The NO_x emissions shall not exceed 2,260 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
33. The NO_x emissions shall not exceed 344.4 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
34. The SO₂ emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
35. The SO₂ emissions shall not exceed 121.9 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit

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

36. The PM emissions shall not exceed 475 pounds in any one day. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.16}$ if P is greater than 30 tons per hour. Particulate emissions shall be no more than 0.1 lbs per 100 lbs of combustible refuse charged. [District Rules NSR, 4202, and 4203, 4.3] Federally Enforceable Through Title V Permit
37. The PM emissions shall not exceed 72.4 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The combined post-control PM₁₀ emissions from the combustion units shall not exceed 70 ton/yr. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
39. Emissions of combustion contaminants from each fuel burning equipment unit shall not exceed 0.1 gr/dscf, corrected to 12% CO₂, and 10 lb/hr. Combustion contaminants are defined as total PM (filterable plus condensable) minus the ammonium salts (e.g. ammonium chloride, ammonium sulfate, ammonium bisulfate, etc.) present in the condensable PM fraction. A "fuel burning equipment unit" is the minimum number of fuel burning equipment required to operate simultaneously for the production of useful heat. Compliance with this emission limit shall be demonstrated annually by source test conducted according to EPA Methods 5 and 202 (or other APCO approved methods). Ammonium salts in the condensable PM fraction shall be determined by analysis of the condensable PM fraction by ion chromatography (or other APCO approved method). [District Rule 4301] Federally Enforceable Through Title V Permit
40. The THC emissions shall not exceed 96 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
41. The THC emissions shall not exceed 14.6 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
42. The THC emissions (as CH₄) from each combustion unit shall not exceed 70 ppmv, dry, corrected to 12% CO₂ as measured by EPA Methods 1-4 and 25A. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Ammonia (NH₃) breakthrough of the exhaust shall not exceed 50 ppmv, dry, as measured by BAAQMD Method ST-1B. The facility shall be exempt from this condition for periods of start-up, shutdown, and malfunction as defined in 40 CFR 60.58b(a). [District Rule 4102]
44. The Antimony emissions from each combustion unit shall not exceed 0.0315 g/s as measured by CARB Method 436. [District Rule 4102]
45. The Arsenic emissions from each combustion unit shall not exceed 0.0005 g/s as measured by CARB Method 436. [District Rule 4102]
46. The Beryllium emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436. [District Rule 4102]
47. The Cadmium emissions from each combustion unit shall not exceed either of the following: 0.0013 g/s; 0.035 milligrams/dscf, corrected to 7% O₂; each as measured by EPA Methods 1, 3, and 29 [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
48. The Chromium +6 emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436 (5% of the total chromium shall be considered to be hexavalent chromium). [District Rule 4102]
49. The Copper emissions from each combustion unit shall not exceed 0.155 g/s as measured by CARB Method 436. [District Rule 4102]
50. The Dioxin/Furan emissions from each combustion unit shall not exceed 30 ng/dscm (total mass), corrected to 7% O₂, as measured by EPA Method 23. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
51. The Dioxin/Furan emissions from each combustion unit shall not exceed 50 ng/s, based on the Department of Health Services toxic equivalent calculation. [District Rule 4102]
52. The Hydrogen Fluoride (HF) emissions from each combustion unit shall not exceed 0.05 g/s as measured by EPA Method 26. [District Rule 4102]

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

53. The Hydrogen Chloride (HCl) emissions from each combustion unit shall not exceed either of the following: 1.4 g/s; 29 ppmv or the HCl removal efficiency shall be at least 95% (by weight or volume), whichever is less stringent, corrected to 7% O₂; each as measured by EPA Method 26. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
54. The Lead emissions from each combustion unit shall not exceed either of the following: 0.014 g/s; 0.400 milligrams/dscf, corrected to 7% O₂; each as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
55. The Manganese emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
56. The Mercury emissions from each combustion unit shall not exceed 0.050 mg/dscm, corrected to 7% O₂, or the mercury removal efficiency shall be at least 85% by weight, whichever is less stringent, as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
57. The Mercury emissions from each combustion unit shall not exceed 0.0025 g/s (3-hour average). [PSD ATC SJ 86-03 and District Rule 4102] Federally Enforceable Through Title V Permit
58. The Nickel emissions from each combustion unit shall not exceed 0.025 g/s as measured by CARB Method 436. [District Rule 4102]
59. The Selenium emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
60. The Vanadium emissions from each combustion unit shall not exceed 0.15 g/s as measured by CARB Method 436. [District Rule 4102]
61. The Zinc emissions from each combustion unit shall not exceed 0.315 g/s as measured by CARB Method 436. [District Rule 4102]
62. The mass emission rates shall be calculated from the hourly stack concentrations and the volumetric flow rate using municipal solid waste Carbon Dioxide based F-factor of 1820 dscf/MMBtu (EPA Method 19, Table 19-2). [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
63. The total steam generated from each boiler shall not exceed 110% of the maximum demonstrated combustion unit load achieved in the most recent Dioxin/Furan performance test, as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
64. The maximum flue gas temperature, measured at the particulate matter control device inlet from each boiler, shall not be higher than 17 deg. C (31 deg. F) above the maximum demonstrated particulate matter control device temperature as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
65. The steam load and particulate matter control device inlet flue gas temperature limitations shall apply at all times except during the annual Dioxin/Furan performance test, the two weeks preceding the annual Dioxin/Furan performance test, and when the facility obtains a waiver in accordance with permission granted by the Administrator or the Air Pollution Control Officer. [40 CFR 60.53b(b)] Federally Enforceable Through Title V Permit
66. The ammonia (NH₃) injection rate shall be measured and recorded continuously. [District NSR Rule] Federally Enforceable Through Title V Permit
67. The facility shall install, calibrate, maintain, and operate a carbon dioxide CEM at the economizer and stack locations of each combustion unit, in accordance with 40 CFR 60.58b(b) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
68. The facility shall install, calibrate, maintain, and operate a continuous opacity monitoring system in accordance with 40 CFR 60.13 and Appendix B. [40 CFR 60.38b and 40 CFR Part 64] Federally Enforceable Through Title V Permit
69. The facility shall install, calibrate, maintain, and operate a sulfur dioxide CEM at the stack locations in accordance with 40 CFR 60.58b(e) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit

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

70. The facility shall install, calibrate, maintain, and operate a nitrogen oxides CEM at the stack locations in accordance with 40 CFR 60.58b(h) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
71. The facility shall install, calibrate, maintain, and operate a carbon monoxide CEM at the stack locations in accordance with 40 CFR 60.58b(i) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
72. The facility shall install, calibrate, maintain, and operate a continuous steam flow monitoring and recording device and a device to measure temperature at the inlet of each particulate matter control device in accordance with 40 CFR 60.58b(i). [40 CFR 60.38b] Federally Enforceable Through Title V Permit
73. The permittee shall be responsible for providing the District access, via telemetry, to the stored computerized data associated with the continuous emission monitoring system. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
74. Continuous monitoring and recording equipment shall be provided for the following: No. 2 fuel oil burning rate and temperature. Each combustion unit shall have sufficient monitors to demonstrate combustion unit temperature profile as required in condition 13 and flue gas temperature into the particulate matter control device as required by condition 64. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
75. In the event that monitoring or test data show that emissions from the facility exceed any emission limitation conditions of this Permit to Operate, the permittee shall take immediate corrective action to bring the plant's emissions within these limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
76. Emissions in excess of those allowed by this permit shall be cause for the District to order an immediate reduction in fuel feed rate or to take other appropriate abatement action. [District Rule 2080] Federally Enforceable Through Title V Permit
77. The permittee shall notify the District of any emission violation by the next working day after such violation has occurred. [District Rule 2080] Federally Enforceable Through Title V Permit
78. Performance testing to demonstrate compliance with permit conditions shall be conducted annually (at least every calendar year but no later than 12 months from previous performance testing). The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
79. All emission measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in this Permit to Operate. [District Rule 4352] Federally Enforceable Through Title V Permit
80. No compliance determination shall be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 3 minutes or longer. [District Rule 4352] Federally Enforceable Through Title V Permit
81. Performance testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any performance test, and a test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
82. The results of each performance test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
83. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO₂ on a dry basis: Oxides of nitrogen emissions; Total hydrocarbons, as methane; Carbon monoxide; Sulfur dioxide; Concentrations of gaseous ammonia (NH₃); and Exhaust flow rate, wet and dry. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
84. Performance tests shall include: Total particulate matter emission concentration corrected to 12% CO₂ and shall be conducted including the condensable portion in the "back half"; and Filterable particulate matter emission concentration corrected to 12% CO₂ and shall be conducted including only "front-half". If the measured Filterable particulate matter emission concentration is greater than 0.008 gr/dscf, corrected to 12% CO₂, testing shall be conducted to verify compliance with condition 26. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit

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

85. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO₂ on a dry basis: Polynuclear aromatic hydrocarbons (Benzo-A-Pyrene, Benzo-E-Pyrene, Benzo-A-Anthracene, and Coronene and PCB); and Dioxins and Furans. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
86. The following Dioxin isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDD; total tetra CDD; 1,2,3,7,8 penta CDD; total penta CDD; 1,2,3,4,7,8 hexa CDD; 1,2,3,6,7,8 hexa CDD; 1,2,3,7,8,9 hexa CDD; total hexa CDD; 1,2,3,4,6,7,8 hepta CDD; total hepta CDD; total octa CDD. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
87. The following Furan isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDF; total tetra CDF; 1,2,3,7,8 penta CDF; 2,3,4,7,8 penta CDF; total penta CDF; 1,2,3,4,7,8 hexa CDF; 1,2,3,6,7,8 hexa CDF; 1,2,3,7,8,9 hexa CDF; 2,3,4,6,7,8 hexa CDF; total hexa CDF; 1,2,3,4,6,7,8 hepta CDF; 1,2,3,4,7,8,9 hepta CDF; total hepta CDF; total octa CDF. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
88. The facility may elect to alternate Dioxin/Furan testing on each stack, if the previous two years indicate Dioxin/Furan emissions levels are less than or equal to 15 ng/dscm total mass, corrected to 12% CO₂. [40 CFR 60.38b and District Rule 4102] Federally Enforceable Through Title V Permit
89. Performance tests of both combustion unit exhausts shall be performed for HCl, corrected to 12% CO₂ on a dry basis, and for the following heavy metals, corrected to 12% CO₂ on a dry basis: Antimony, Arsenic, Beryllium, Cadmium, Total Chromium (5% of the total chromium shall be considered to be hexavalent chromium), Copper, Lead, Manganese, Mercury, Nickel, Selenium, Vanadium, and Zinc. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
90. A performance test of both combustion unit exhausts shall be performed for HF, corrected to 12% CO₂ on a dry basis. [District Rule 4102]
91. Cooling tower drift shall not exceed 0.005 percent of the circulating water flow or a maximum annual drift emission rate of 1,090,000 kg/year as demonstrated by design calculations. Chromium compounds shall not be used as an additive in the cooling tower water. [District Rule 4102]
92. Soot blowers or super heater rappers shall be operated in a mode consistent with normal cleaning requirements of the system during the performance tests. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
93. The facility shall submit an annual report in accordance with 40 CFR 60.59b(g) by February 1 of each year following the calendar year in which the data were collected. [40 CFR 60.39b] Federally Enforceable Through Title V Permit
94. The facility shall submit semiannual reports within 31 days following the end of each 6 month period in accordance with 40 CFR 60.59b(h). [40 CFR 60.39b] Federally Enforceable Through Title V Permit
95. A monthly report summarizing the quantity of pollutant emissions of SO₂, NO_x, and CO, based on data from the CEM system, shall be included in the information required by following condition. Copies of the monthly reports prepared pursuant to this condition shall be sent to the district office by the 15th day of the following month. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
96. Permittee shall maintain a complete file containing all measurements, records, required monitoring data and support information. Support information includes copies of all reports required by this permit and for continuous monitoring instrumentation, and all calibration and maintenance records. This file shall include, but not be limited to: (a) Data collected from in-stack monitoring instruments; (b) Input rate records for all fuels burned; (c) Purchase records that indicate the sulfur content, by weight, of all fuel oil #2 purchased; (d) Results of all source tests; (e) All other air pollution system performance evaluations and records of calibration checks, calibration gas cylinder changes, adjustments and maintenance performed on all equipment (including CEM adjustment or maintenance). [District Rule 1070, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
97. Records shall be kept for each unit with the following: (a) Specific time of operation of each combustion unit; (b) Specific time of operation of the auxiliary burners; (c) Equipment breakdowns or malfunctions; (d) Exceedances of emission standards. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit

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98. The permittee shall follow all written maintenance procedures and schedules for the following: all emissions control equipment, combustion units, and monitoring equipment for measuring emission levels. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
99. Operating and maintenance manuals, subject to District review, shall be provided for the equipment covered by this permit. The permittee's operators shall be trained in the operation and maintenance of both fuel burning and pollution control equipment. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
100. If the Fuel Oil #2 is Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.25% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
101. If the Fuel Oil #2 is non-certified for sulfur content of less than 0.25% by weight, then the owner or operator shall determine the sulfur content of each delivery of Fuel Oil being fired. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
102. Permittee shall provide access to all sampling ports and platforms on boiler exhaust stacks in accordance with 40 CFR 60.8(e) and District Rule 1081 (as amended 12/16/93). [District Rule 1081, 3.3; & PSD SJ 86-03] Federally Enforceable Through Title V Permit
103. The SO₂ emissions from both combustion units shall be more stringent of 35.6 lb/hr or 42 ppm, dry, corrected to 12% CO₂, averaged over three hour period and more stringent of 33.3 lb/hr or 40 ppm, dry, corrected to 12% CO₂, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
104. The NO_x emissions from both combustion units shall be more stringent of 107 lb/hr or 175 ppm, dry, corrected to 12% CO₂, averaged over three hour period and more stringent of 100 lb/hr or 165 ppm, dry, corrected to 12% CO₂, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
105. The CO emissions from both combustion units shall be 33.3 lb/hr or 400 ppm, dry, corrected to 12% CO₂ (3-hour average). [PSD SJ 86-03] Federally Enforceable Through Title V Permit
106. The Mercury emissions from both combustion units shall not exceed 0.083 lb/hr (3-hour average) as measured by EPA Method 101. Upon EPA approval of a change to the facility PSD permit allowing Method 29 to be used in place of Method 101, Method 29 may be used to measure Mercury emissions. (40 CFR Part 61, Appendix B). [PSD SJ 86-03] Federally Enforceable Through Title V Permit
107. Permittee shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: (a) the magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions. (b) Specific identification of each time period of excess emissions that occurs during startups, shutdowns, and malfunctions of furnace/boiler system. The nature and cause of malfunction (if known) and corrective action taken or preventive measures adopted shall be reported. (c) The date and time identifying each period during which continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs and adjustments. (d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in report. (e) Excess emissions shall be defined as any three-hour period during which the average emissions of NO_x, SO₂, and/or CO, as measured by continuous monitoring system exceeds the NO_x, SO₂, and/or CO emission limit set for each of the pollutants. (f) Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limit for purposes of PSD permit. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
108. The calculation of annual emissions shall commence with the submission of the first fourth-quarter report, and will continue to be calculated and submitted with each successive quarterly report. The quarterly reports shall contain highest annual emissions computed for each week in the quarter, as well as all excesses of the annual emissions limits. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
109. Permittee shall meet all applicable requirements of Subparts A, Db, and E of 40 CFR 60. [PSD SJ 86-03] Federally Enforceable Through Title V Permit

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110. Permittee shall comply with following activated carbon mass feed requirements: (1) During the initial performance test and each subsequent performance test for dioxins/furans and mercury, as applicable, the permittee shall calculate and record an average carbon mass feed rate in pounds per hour being employed based on load cell measurements of carbon feed during the test; (2) During operation of the facility, the carbon injection mass feed rate must be measured using load cells, calculated and recorded on an eight (8) hour block average basis, and must equal or exceed the level(s) documented during the most recent performance tests for dioxins/furans and mercury. When calculating the eight (8) hour block average, exclude the hours when the combustion unit is not operational and include the hours when the combustion unit is operating but the carbon feed system is not working properly. [40 CFR 60.38b & 40 CFR 60.58b(m)(1), (2)] Federally Enforceable Through Title V Permit
111. The permittee shall estimate the total carbon usage of the plant (kilograms or pounds) for each calendar quarter by two independent methods, according to the following procedures: (1) The weight of carbon delivered to the plant. (2) The permittee shall estimate the average carbon mass feed rate for each during the operation of each combustion unit, and sum the results for both units at the plant for the total number of hours of operation during the calendar quarter. [40 CFR 60.38b & 40 CFR 60.58b(m)] Federally Enforceable Through Title V Permit
112. Should additional guidance related to the June 3, 1986 PSD remand, applicable to PSD permit action, be developed, the Permittee shall provide to EPA any such analysis, data, or demonstration of compliance with the other requirements within the time required by the guidance. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
113. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Section VIII of these conditions. In addition, the Regional Administrator shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Section IX of these conditions, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of this permit or of any law or regulations which such malfunction may cause. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
114. Facility shall operate only when a fully certified chief facility operator or fully certified shift supervisor is on duty, except as allowed under 40 CFR 60.54b(c)(2). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
115. All chief facility operators, shift supervisors, and control room operators shall have completed the EPA or State municipal waste combustor operator training course. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
116. Owner or operator shall conduct a performance test for opacity on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) using EPA Method 9 and the average of three test runs to determine compliance. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
117. Permittee shall establish parameters for the differential pressure across the baghouse filter, which provides a reasonable assurance of ongoing compliance with emission limitations stated in this permit. The initial parameters shall be established using manufacturer/supplier recommendations and by correlating with opacity readings and source test results. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
118. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
119. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit

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

120. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
121. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9 [40 CFR Part 64] Federally Enforceable Through Title V Permit
122. During any 96-hour periods of startup or 12-hour periods of shutdown, the facility shall be exempt from emission limits identified in this permit which are based upon District Rule 4352. [District Rule 4352] Federally Enforceable Through Title V Permit
123. Upon detecting any excursion from the 10% opacity limit, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
124. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 10 inches water column [40 CFR Part 64] Federally Enforceable Through Title V Permit
125. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
126. Each time SO₂ emissions from each combustion unit exceeds 30 ppmv, dry, corrected to 12% CO₂, based on an eight-hour rolling average, facility shall demonstrate that SO₂ removal efficiency is at least 80% as measured by EPA Methods 1-4 and 6C, based on the measurement of the inlet and outlet SO₂ concentrations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
127. A permit shield is granted from 40 CFR 60 Subpart Db (2/27/14) requirements for these units because the combustors are exempt from the requirements of Subpart Db since the facility meets the applicability requirements and is subject to an EPA approved State Section 111(d)/129 plan implementing 40 CFR 60 Subpart Db. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
128. A permit shield is granted from 40 CFR 60 Subpart Dc requirements for these units because the units are rated greater than 100 MMBtu/hr and thus don't meet the applicability criteria of Subpart Dc. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
129. A permit shield is granted from District Rule 4305 (8/21/03) requirements since section 4.1.1 of this rule exempts solid fuel fired units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
130. A permit shield is granted from District Rule 4351 (8/21/03) requirements since section 4.1.2 of this rule exempts solid fuel fired units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
131. Compliance with the permit conditions in this permit shall be deemed compliance with the requirements of District Rule 4352 (12/15/11). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
132. A permit shield is granted from District Rule 4802 (12/17/92) requirements since the combustors do not meet the definition of sulfuric acid production units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
133. A permit shield is granted from District Rule 7012 (12/17/92) requirements since the use of cooling water additives containing hexavalent chromium is prohibited. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2073-4-1

EXPIRATION DATE: 10/31/2016

EQUIPMENT DESCRIPTION:

175 BHP CLARKE/JOHN DEERE MODEL JU6H-UFADMG TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE
POWERING A FIRE PUMP

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed any of the following limits: 2.5 g-NOx/bhp-hr, 1.0 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed 0.09 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
8. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
9. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rules 4102, 4701, and 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4701 and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. The permittee shall maintain monthly records of the type of fuel purchased. [District Rules 4701 and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701 and 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
13. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the requirements of District Rule 4701 (8/21/03). A permit shield has been granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
14. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the requirements of District Rule 4702 (11/14/13). A permit shield has been granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-2073-0-2

EXPIRATION DATE: 10/31/2016

FACILITY-WIDE REQUIREMENTS

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; Stanislaus County Rule 110; and PSD SJ 86-03] 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; Stanislaus County Rule 110; and PSD SJ 86-03] 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 9.12.1] 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: COVANTA STANISLAUS, INC
Location: 4040 FINK RD, CROWS LANDING, CA 95313
N-2073-0-2 Jan 3 2017 2:32PM - HARADERJ

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4 and PSD SJ 86-03] 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 Stanislaus County Rule 401] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. In the event of changes in control or ownership, this Operating Permit shall be binding on new owners and operators. The applicant shall notify successor of the existence of this Operating Permit and its conditions in writing and forward a copy to the District, California Air Resources Board, and EPA. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
42. The applicant shall construct and operate the facility in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State and District air quality regulations. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
43. All correspondence as required by this Operating Permit shall be forwarded to: the District; Director, Air & Toxics Div. (Attn: A-3-3), EPA Region 9, 75 Hawthorne St. San Francisco, CA 94105; and Director, Stationary Source Div., CARB, Box 2815, Sacramento, CA 95812. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
46. Compliance with permit conditions in the Title V shall be deemed compliance with following applicable requirements: 40 CFR 82 Subparts A, B, C, D, E and F. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1st 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: N-2073-1-14

EXPIRATION DATE: 10/31/2016

EQUIPMENT DESCRIPTION:

TWO 400 TON/DAY MUNICIPAL SOLID WASTE COMBUSTOR/BOILERS PRODUCING 21.5 MW OF ELECTRICITY EQUIPPED WITH DRY LIME SCRUBBERS, FLY ASH BAGHOUSE, AMMONIA INJECTION SYSTEM, LIME SLURRY INJECTION, ACTIVATED CARBON INJECTION SYSTEM, LIME AND SODA AND CARBON SILOS WITH FILTER VENTS, WASTE RECEIVING, ASH CONVEYING, AND ASH RESIDUE ENCLOSURE

PERMIT UNIT REQUIREMENTS

1. All equipment, facilities and systems installed or used to comply with the terms and conditions of this Permit to Operate shall be maintained in good working order and be operated as required to meet the conditions of this permit. Operator shall, on each boiler, continuously operate and maintain the following air pollution controls to minimize emissions: baghouse for the control of particulates; lime slurry dry scrubber for the control of SO₂ and acid gas emissions; and ammonia injection system for the control of NO_x emissions. [District Rule 2080 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
2. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. The baghouse shall have a maximum effective air-to-cloth ratio of 4:1 and shall be equipped with an automatic cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest individual combustion unit baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from any location other than designated vents on refuse receiving, processing or storage buildings at any time, except as provided in this permit to operate. Visible emissions shall be inspected quarterly under material and environmental conditions, such as dry and windy, where high emissions are expected. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
6. Paved areas shall be kept free of visible dust at all times and shall be vacuum swept at least once every fourteen days. Records of vacuum sweeping shall be maintained and made available to the District upon request. [District Rule 4102]
7. The NO_x control system shall be in full use whenever this equipment is fired with MSW. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The total PM₁₀ emissions from the ash handling system (including ferrous and non-ferrous material recovery operations) inside the ash enclosure shall not exceed 1.2 pounds in any one day and 402 pounds in any rolling 12 consecutive month period. The permittee shall maintain records sufficient to demonstrate compliance with these limits. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The PM₁₀ emissions from the non-ferrous material recovery equipment in the ash enclosure shall not exceed 183 pounds in any rolling 12 consecutive month period. The permittee shall maintain records sufficient to demonstrate compliance with this limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [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. The ash shall be handled in such a manner as to mitigate fugitive emissions to the maximum extent possible. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
11. The facility shall not cause visible emissions from ash conveying systems, including transfer points, in excess of 5% of the observation period, as determined by performing EPA Method 22 on a quarterly basis. Fugitive ash emissions do not include emissions within a building, an enclosed ash conveyor, or during periods of maintenance and repair of the ash conveyor systems. [40 CFR 60.36b] Federally Enforceable Through Title V Permit
12. Fuel Oil #2, with a sulfur content not to exceed 0.25% by weight, may be used as necessary to maintain the minimum combustion zone temperature requirements and annual usage shall not exceed 1,108,321 gallons for each combustor. [District NSR Rule, 40 CFR 60. 44b(c) & PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. A furnace roof temperature of 1,100 degrees F shall be stabilized, as measured by multiple thermocouples, to ensure that a minimum temperature of 1,800 degrees F is established above the grate prior to the ignition of MSW. [District NSR Rule] Federally Enforceable Through Title V Permit
14. During any period of time that MSW is burning on the grates, the combustion gas retention time shall be maintained at a minimum of one second, the combustion zone temperature shall be maintained at a minimum of 1,800 degrees F, and the furnace roof temperature shall be maintained at an average (4 hour arithmetic block) of 1,100 degrees F, except during periods of start-up, shutdown, and malfunction, as defined in 40 CFR 60.58b(a). [District NSR Rule] Federally Enforceable Through Title V Permit
15. Hazardous materials shall not be burned in this equipment. Hazardous materials are that portion of solid waste which, by reason of its composition or characteristics, is: (a) hazardous waste as defined in the Solid Waste Disposal Act, 42 USC section 6901 et. seq., and the regulations thereunder, the California Health & Safety Code, Div. 20, Chs. 6.5, 6.7, and 6.8 (section 25100 et. seq.), the California Code of Regulations, Title 22, Div. 4.5, and any similar or substituted legislation or regulations or amendments to the foregoing; (b) any other materials which any governmental agency or unit having appropriate jurisdiction shall determine from time to time is harmful, toxic, or dangerous, or otherwise ineligible for disposal through the facility; and (c) any material, other than residential or commercial solid waste of the type historically collected by the County and the City as acceptable for disposal into non-hazardous waste landfills, which would result in process residue being hazardous waste under (a) or (b) above. [District Rule 4102]
16. The facility shall develop and annually update a site-specific operating manual in accordance with 40 CFR 60.54b(e). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
17. Each operator and all maintenance personnel shall receive initial and annual training on the site-specific operating manual in accordance with 40 CFR 60.54b(f). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
18. The site-specific operating manual and operating manual training records shall be accessible to all operations and maintenance personnel and shall be made available to the enforcement agency upon request. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
19. The District reserves the right to require the permittee to re-evaluate the health risk assessment if there is a significant change in population locations as projected in the currently approved health risk assessment, or new health data becomes available. [District Rule 4102]
20. During any 3-hour periods of startup, shutdown, and malfunction, the facility shall be exempt from emission limits identified in this permit which are based upon 40 CFR 60 Subpart Cb or Subpart Eb. This exemption shall not apply to CO emission limits of 40 CFR 60.53b(a) if the malfunction is a loss of boiler water level control. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Opacity exhibited by the gases discharged to the atmosphere from each combustion unit, other than water vapor, shall not exceed 10 percent based on a six minute average as measured by EPA Method 9. [40 CFR 60.33b and 40 CFR Part 64] Federally Enforceable Through Title V Permit
22. The carbon monoxide (CO) emissions from each combustion unit shall not exceed 100 ppmv, dry, corrected to 7% O₂, as measured utilizing EPA Methods 1-4 and 10. Compliance with this limit shall be determined based on a four hour block arithmetic average as defined in 40 CFR 60.51b. [District Rule 4352 and 40 CFR 60.34b] 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 NO_x emissions from each combustion unit shall not exceed 200 ppmv, dry, corrected to 12% CO₂ as measured by EPA Methods 1-4 and 7E. Compliance with this limit shall be determined based on an eight rolling hour average. [District NSR Rule, District Rule 4352, and 40 CFR 60.33b] Federally Enforceable Through Title V Permit
24. Either the SO₂ emissions from each combustion unit shall not exceed 30 ppmv, dry, corrected to 12% CO₂, based on an eight hour rolling average, or the SO₂ removal efficiency shall be at least 80% as measured by EPA Methods 1-4 and 6C. The SO₂ 80% removal efficiency shall be based on the measurement of the inlet and outlet SO₂ concentrations, corrected to 12% CO₂. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The SO₂ emissions from each combustion unit shall not exceed 29 ppmv, dry, corrected to 12% CO₂, or the SO₂ removal efficiency shall be at least 75% (by weight or volume), whichever is less stringent as measured by EPA Methods 1-4 and 6C. Compliance with this limit shall be determined based on a 24-hour daily geometric mean. EPA method 19 shall be used to calculate the daily geometric average sulfur dioxide emission concentration and removal efficiency. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
26. Particulate matter emissions from each combustion unit shall not exceed 0.0275 gr/dscf, corrected to 12% CO₂, as measured by EPA Methods 1 through 5, including the condensable portion in the "back-half". [District NSR Rule] Federally Enforceable Through Title V Permit
27. Filterable particulate matter (i.e. front half) emissions from each combustion unit shall not exceed any of the following emission limits: 0.011 gr/dscf, corrected to 12% CO₂; 25 milligrams/dscf, corrected to 7% O₂; 0.10 lb/MMBtu heat input. Owner or operator shall conduct a performance test for particulate matter on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) with EPA Method 1; EPA Method 3, 3A, or 3B; and EPA Method 5. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than 160 degrees C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run. [District NSR Rule, 40 CFR 60.33b, 40 CFR 60.38b, and 40 CFR 60.43b(d)(1)] Federally Enforceable Through Title V Permit
28. Filterable particulate matter emissions from each combustion unit shall not exceed 0.008 gr/dscf, corrected to 12% CO₂, for the fraction of particles less than 2 μ in diameter, as measured by Andersen Cascade Impactor, Flow Sensor Multiclone or any other equivalent measurement as validated by EPA Method 301. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Each combustion unit shall only be allowed to emit half of the total allowable (mass) emission rate for each pollutant. [District NSR Rule] Federally Enforceable Through Title V Permit
30. The CO emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
31. The CO emissions shall not exceed 121.9 tons/yr. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
32. The NO_x emissions shall not exceed 2,260 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
33. The NO_x emissions shall not exceed 344.4 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
34. The SO₂ emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
35. The SO₂ emissions shall not exceed 121.9 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit

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36. The PM emissions shall not exceed 475 pounds in any one day. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.16}$ if P is greater than 30 tons per hour. Particulate emissions shall be no more than 0.1 lbs per 100 lbs of combustible refuse charged. [District Rules NSR, 4202, and 4203, 4.3] Federally Enforceable Through Title V Permit
37. The PM emissions shall not exceed 72.4 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The combined post-control PM10 emissions from the combustion units shall not exceed 70 ton/yr. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
39. Emissions of combustion contaminants from each fuel burning equipment unit shall not exceed 0.1 gr/dscf, corrected to 12% CO₂, and 10 lb/hr. Combustion contaminants are defined as total PM (filterable plus condensable) minus the ammonium salts (e.g. ammonium chloride, ammonium sulfate, ammonium bisulfate, etc.) present in the condensable PM fraction. A "fuel burning equipment unit" is the minimum number of fuel burning equipment required to operate simultaneously for the production of useful heat. Compliance with this emission limit shall be demonstrated annually by source test conducted according to EPA Methods 5 and 202 (or other APCO approved methods). Ammonium salts in the condensable PM fraction shall be determined by analysis of the condensable PM fraction by ion chromatography (or other APCO approved method). [District Rule 4301] Federally Enforceable Through Title V Permit
40. The THC emissions shall not exceed 96 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
41. The THC emissions shall not exceed 14.6 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
42. The THC emissions (as CH₄) from each combustion unit shall not exceed 70 ppmv, dry, corrected to 12% CO₂ as measured by EPA Methods 1-4 and 25A. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Ammonia (NH₃) breakthrough of the exhaust shall not exceed 50 ppmv, dry, as measured by BAAQMD Method ST-1B. The facility shall be exempt from this condition for periods of start-up, shutdown, and malfunction as defined in 40 CFR 60.58b(a). [District Rule 4102]
44. The Antimony emissions from each combustion unit shall not exceed 0.0315 g/s as measured by CARB Method 436. [District Rule 4102]
45. The Arsenic emissions from each combustion unit shall not exceed 0.0005 g/s as measured by CARB Method 436. [District Rule 4102]
46. The Beryllium emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436. [District Rule 4102]
47. The Cadmium emissions from each combustion unit shall not exceed either of the following: 0.0013 g/s; 0.035 milligrams/dscf, corrected to 7% O₂; each as measured by EPA Methods 1, 3, and 29 [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
48. The Chromium +6 emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436 (5% of the total chromium shall be considered to be hexavalent chromium). [District Rule 4102]
49. The Copper emissions from each combustion unit shall not exceed 0.155 g/s as measured by CARB Method 436. [District Rule 4102]
50. The Dioxin/Furan emissions from each combustion unit shall not exceed 30 ng/dscm (total mass), corrected to 7% O₂, as measured by EPA Method 23. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
51. The Dioxin/Furan emissions from each combustion unit shall not exceed 50 ng/s, based on the Department of Health Services toxic equivalent calculation. [District Rule 4102]
52. The Hydrogen Fluoride (HF) emissions from each combustion unit shall not exceed 0.05 g/s as measured by EPA Method 26. [District Rule 4102]

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53. The Hydrogen Chloride (HCl) emissions from each combustion unit shall not exceed either of the following: 1.4 g/s; 29 ppmv or the HCl removal efficiency shall be at least 95% (by weight or volume), whichever is less stringent, corrected to 7% O₂; each as measured by EPA Method 26. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
54. The Lead emissions from each combustion unit shall not exceed either of the following: 0.014 g/s; 0.400 milligrams/dscf, corrected to 7% O₂; each as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
55. The Manganese emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
56. The Mercury emissions from each combustion unit shall not exceed 0.050 mg/dscm, corrected to 7% O₂, or the mercury removal efficiency shall be at least 85% by weight, whichever is less stringent, as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
57. The Mercury emissions from each combustion unit shall not exceed 0.0025 g/s (3-hour average). [PSD ATC SJ 86-03 and District Rule 4102] Federally Enforceable Through Title V Permit
58. The Nickel emissions from each combustion unit shall not exceed 0.025 g/s as measured by CARB Method 436. [District Rule 4102]
59. The Selenium emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
60. The Vanadium emissions from each combustion unit shall not exceed 0.15 g/s as measured by CARB Method 436. [District Rule 4102]
61. The Zinc emissions from each combustion unit shall not exceed 0.315 g/s as measured by CARB Method 436. [District Rule 4102]
62. The mass emission rates shall be calculated from the hourly stack concentrations and the volumetric flow rate using municipal solid waste Carbon Dioxide based F-factor of 1820 dscf/MMBtu (EPA Method 19, Table 19-2). [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
63. The total steam generated from each boiler shall not exceed 110% of the maximum demonstrated combustion unit load achieved in the most recent Dioxin/Furan performance test, as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
64. The maximum flue gas temperature, measured at the particulate matter control device inlet from each boiler, shall not be higher than 17 deg. C (31 deg. F) above the maximum demonstrated particulate matter control device temperature as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
65. The steam load and particulate matter control device inlet flue gas temperature limitations shall apply at all times except during the annual Dioxin/Furan performance test, the two weeks preceding the annual Dioxin/Furan performance test, and when the facility obtains a waiver in accordance with permission granted by the Administrator or the Air Pollution Control Officer. [40 CFR 60.53b(b)] Federally Enforceable Through Title V Permit
66. The ammonia (NH₃) injection rate shall be measured and recorded continuously. [District NSR Rule] Federally Enforceable Through Title V Permit
67. The facility shall install, calibrate, maintain, and operate a carbon dioxide CEM at the economizer and stack locations of each combustion unit, in accordance with 40 CFR 60.58b(b) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
68. The facility shall install, calibrate, maintain, and operate a continuous opacity monitoring system in accordance with 40 CFR 60.13 and Appendix B. [40 CFR 60.38b and 40 CFR Part 64] Federally Enforceable Through Title V Permit
69. The facility shall install, calibrate, maintain, and operate a sulfur dioxide CEM at the stack locations in accordance with 40 CFR 60.58b(e) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit

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70. The facility shall install, calibrate, maintain, and operate a nitrogen oxides CEM at the stack locations in accordance with 40 CFR 60.58b(h) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
71. The facility shall install, calibrate, maintain, and operate a carbon monoxide CEM at the stack locations in accordance with 40 CFR 60.58b(i) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
72. The facility shall install, calibrate, maintain, and operate a continuous steam flow monitoring and recording device and a device to measure temperature at the inlet of each particulate matter control device in accordance with 40 CFR 60.58b(i). [40 CFR 60.38b] Federally Enforceable Through Title V Permit
73. The permittee shall be responsible for providing the District access, via telemetry, to the stored computerized data associated with the continuous emission monitoring system. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
74. Continuous monitoring and recording equipment shall be provided for the following: No. 2 fuel oil burning rate and temperature. Each combustion unit shall have sufficient monitors to demonstrate combustion unit temperature profile as required in condition 12 and flue gas temperature into the particulate matter control device as required by condition 61. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
75. In the event that monitoring or test data show that emissions from the facility exceed any emission limitation conditions of this Permit to Operate, the permittee shall take immediate corrective action to bring the plant's emissions within these limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
76. Emissions in excess of those allowed by this permit shall be cause for the District to order an immediate reduction in fuel feed rate or to take other appropriate abatement action. [District Rule 2080] Federally Enforceable Through Title V Permit
77. The permittee shall notify the District of any emission violation by the next working day after such violation has occurred. [District Rule 2080] Federally Enforceable Through Title V Permit
78. Performance testing to demonstrate compliance with permit conditions shall be conducted annually (at least every calendar year but no later than 12 months from previous performance testing). The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
79. Performance testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any performance test, and a test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
80. The results of each performance test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
81. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO₂ on a dry basis: Oxides of nitrogen emissions; Total hydrocarbons, as methane; Carbon monoxide; Sulfur dioxide; Concentrations of gaseous ammonia (NH₃); and Exhaust flow rate, wet and dry. [District Rule 1081, 4.0]
82. Performance tests shall include: Total particulate matter emission concentration corrected to 12% CO₂ and shall be conducted including the condensable portion in the "back half"; and Filterable particulate matter emission concentration corrected to 12% CO₂ and shall be conducted including only "front-half". If the measured Filterable particulate matter emission concentration is greater than 0.008 gr/dscf, corrected to 12% CO₂, testing shall be conducted to verify compliance with condition 26. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
83. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO₂ on a dry basis: Polynuclear aromatic hydrocarbons (Benzo-A-Pyrene, Benzo-E-Pyrene, Benzo-A-Anthracene, and Coronene and PCB); and Dioxins and Furans. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit

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84. The following Dioxin isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDD; total tetra CDD; 1,2,3,7,8 penta CDD; total penta CDD; 1,2,3,4,7,8 hexa CDD; 1,2,3,6,7,8 hexa CDD; 1,2,3,7,8,9 hexa CDD; total hexa CDD; 1,2,3,4,6,7,8 hepta CDD; total hepta CDD; total octa CDD. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
85. The following Furan isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDF; total tetra CDF; 1,2,3,7,8 penta CDF; 2,3,4,7,8 penta CDF; total penta CDF; 1,2,3,4,7,8 hexa CDF; 1,2,3,6,7,8 hexa CDF; 1,2,3,7,8,9 hexa CDF; 2,3,4,6,7,8 hexa CDF; total hexa CDF; 1,2,3,4,6,7,8 hepta CDF; 1,2,3,4,7,8,9 hepta CDF; total hepta CDF; total octa CDF. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
86. The facility may elect to alternate Dioxin/Furan testing on each stack, if the previous two years indicate Dioxin/Furan emissions levels are less than or equal to 15 ng/dscm total mass, corrected to 12% CO₂. [40 CFR 60.38b and District Rule 4102] Federally Enforceable Through Title V Permit
87. Performance tests of both combustion unit exhausts shall be performed for HCl, corrected to 12% CO₂ on a dry basis, and for the following heavy metals, corrected to 12% CO₂ on a dry basis: Antimony, Arsenic, Beryllium, Cadmium, Total Chromium (5% of the total chromium shall be considered to be hexavalent chromium), Copper, Lead, Manganese, Mercury, Nickel, Selenium, Vanadium, and Zinc. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
88. A performance test of both combustion unit exhausts shall be performed for HF, corrected to 12% CO₂ on a dry basis. [District Rule 4102]
89. Cooling tower drift shall not exceed 0.005 percent of the circulating water flow or a maximum annual drift emission rate of 1,090,000 kg/year as demonstrated by design calculations. Chromium compounds shall not be used as an additive in the cooling tower water. [District Rule 4102]
90. Soot blowers or super heater rappers shall be operated in a mode consistent with normal cleaning requirements of the system during the performance tests. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
91. The facility shall submit an annual report in accordance with 40 CFR 60.59b(g) by February 1 of each year following the calendar year in which the data were collected. [40 CFR 60.39b] Federally Enforceable Through Title V Permit
92. The facility shall submit semiannual reports within 31 days following the end of each 6 month period in accordance with 40 CFR 60.59b(h). [40 CFR 60.39b] Federally Enforceable Through Title V Permit
93. A monthly report summarizing the quantity of pollutant emissions of SO₂, NO_x, and CO, based on data from the CEM system, shall be included in the information required by following condition. Copies of the monthly reports prepared pursuant to this condition shall be sent to the district office by the 15th day of the following month. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
94. Permittee shall maintain a complete file containing all measurements, records, required monitoring data and support information. Support information includes copies of all reports required by this permit and for continuous monitoring instrumentation, and all calibration and maintenance records. This file shall include, but not be limited to: (a) Data collected from in-stack monitoring instruments; (b) Input rate records for all fuels burned; (c) Purchase records that indicate the sulfur content, by weight, of all fuel oil #2 purchased; (d) Results of all source tests; (e) All other air pollution system performance evaluations and records of calibration checks, calibration gas cylinder changes, adjustments and maintenance performed on all equipment (including CEM adjustment or maintenance). [District Rule 1070, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
95. Records shall be kept for each unit with the following: (a) Specific time of operation of each combustion unit; (b) Specific time of operation of the auxiliary burners; (c) Equipment breakdowns or malfunctions; (d) Exceedances of emission standards. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
96. The permittee shall follow all written maintenance procedures and schedules for the following: all emissions control equipment, combustion units, and monitoring equipment for measuring emission levels. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit

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97. Operating and maintenance manuals, subject to District review, shall be provided for the equipment covered by this permit. The permittee's operators shall be trained in the operation and maintenance of both fuel burning and pollution control equipment. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
98. If the Fuel Oil #2 is Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.25% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
99. If the Fuel Oil #2 is non-certified for sulfur content of less than 0.25% by weight, then the owner or operator shall determine the sulfur content of each delivery of Fuel Oil being fired. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
100. Permittee shall provide access to all sampling ports and platforms on boiler exhaust stacks in accordance with 40 CFR 60.8(e) and District Rule 1081 (as amended 12/16/93). [District Rule 1081, 3.3; & PSD SJ 86-03] Federally Enforceable Through Title V Permit
101. The SO₂ emissions from both combustion units shall be more stringent of 35.6 lb/hr or 42 ppm, dry, corrected to 12% CO₂, averaged over three hour period and more stringent of 33.3 lb/hr or 40 ppm, dry, corrected to 12% CO₂, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
102. The NO_x emissions from both combustion units shall be more stringent of 107 lb/hr or 175 ppm, dry, corrected to 12% CO₂, averaged over three hour period and more stringent of 100 lb/hr or 165 ppm, dry, corrected to 12% CO₂, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
103. The CO emissions from both combustion units shall be 33.3 lb/hr or 400 ppm, dry, corrected to 12% CO₂ (3-hour average). [PSD SJ 86-03] Federally Enforceable Through Title V Permit
104. The Mercury emissions from both combustion units shall not exceed 0.083 lb/hr (3-hour average) as measured by EPA Method 101. Upon EPA approval of a change to the facility PSD permit allowing Method 29 to be used in place of Method 101, Method 29 may be used to measure Mercury emissions. (40 CFR Part 61, Appendix B). [PSD SJ 86-03] Federally Enforceable Through Title V Permit
105. Permittee shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: (a) the magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions. (b) Specific identification of each time period of excess emissions that occurs during startups, shutdowns, and malfunctions of furnace/boiler system. The nature and cause of malfunction (if known) and corrective action taken or preventive measures adopted shall be reported. (c) The date and time identifying each period during which continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs and adjustments. (d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in report. (e) Excess emissions shall be defined as any three-hour period during which the average emissions of NO_x, SO₂, and/or CO, as measured by continuous monitoring system exceeds the NO_x, SO₂, and/or CO emission limit set for each of the pollutants. (f) Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limit for purposes of PSD permit. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
106. The calculation of annual emissions shall commence with the submission of the first fourth-quarter report, and will continue to be calculated and submitted with each successive quarterly report. The quarterly reports shall contain highest annual emissions computed for each week in the quarter, as well as all excesses of the annual emissions limits. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
107. Permittee shall meet all applicable requirements of Subparts A, Db, and E of 40 CFR 60. [PSD SJ 86-03] Federally Enforceable Through Title V Permit

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108. Permittee shall comply with following activated carbon mass feed requirements: (1) During the initial performance test and each subsequent performance test for dioxins/furans and mercury, as applicable, the permittee shall calculate and record an average carbon mass feed rate in pounds per hour being employed based on load cell measurements of carbon feed during the test; (2) During operation of the facility, the carbon injection mass feed rate must be measured using load cells, calculated and recorded on an eight (8) hour block average basis, and must equal or exceed the level(s) documented during the most recent performance tests for dioxins/furans and mercury. When calculating the eight (8) hour block average, exclude the hours when the combustion unit is not operational and include the hours when the combustion unit is operating but the carbon feed system is not working properly. [40 CFR 60.38b & 40 CFR 60.58b(m)(1), (2)] Federally Enforceable Through Title V Permit
109. The permittee shall estimate the total carbon usage of the plant (kilograms or pounds) for each calendar quarter by two independent methods, according to the following procedures: (1) The weight of carbon delivered to the plant. (2) The permittee shall estimate the average carbon mass feed rate for each during the operation of each combustion unit, and sum the results for both units at the plant for the total number of hours of operation during the calendar quarter. [40 CFR 60.38b & 40 CFR 60.58b(m)] Federally Enforceable Through Title V Permit
110. Should additional guidance related to the June 3, 1986 PSD remand, applicable to PSD permit action, be developed, the Permittee shall provide to EPA any such analysis, data, or demonstration of compliance with the other requirements within the time required by the guidance. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
111. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Section VIII of these conditions. In addition, the Regional Administrator shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Section IX of these conditions, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of this permit or of any law or regulations which such malfunction may cause. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
112. Facility shall operate only when a fully certified chief facility operator or fully certified shift supervisor is on duty, except as allowed under 40 CFR 60.54b(c)(2). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
113. All chief facility operators, shift supervisors, and control room operators shall have completed the EPA or State municipal waste combustor operator training course. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
114. Owner or operator shall conduct a performance test for opacity on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) using EPA Method 9 and the average of three test runs to determine compliance. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
115. Permittee shall establish parameters for the differential pressure across the baghouse filter, which provides a reasonable assurance of ongoing compliance with emission limitations stated in this permit. The initial parameters shall be established using manufacturer/supplier recommendations and by correlating with opacity readings and source test results. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
116. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
117. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit

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118. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
119. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9 [40 CFR Part 64] Federally Enforceable Through Title V Permit
120. During any 96-hour periods of startup or 12-hour periods of shutdown, the facility shall be exempt from emission limits identified in this permit which are based upon District Rule 4352. [District Rule 4352] Federally Enforceable Through Title V Permit
121. Upon detecting any excursion from the 10% opacity limit, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
122. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 10 inches water column [40 CFR Part 64] Federally Enforceable Through Title V Permit
123. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
124. On and after January 1, 2013, permittee shall demonstrate compliance with Table 1 emission limits and all applicable requirements of District Rule 4352 (December 15, 2011). [District Rule 4352] Federally Enforceable Through Title V Permit
125. Each time SO₂ emissions from each combustion unit exceeds 30 ppmv, dry, corrected to 12% CO₂, based on an eight-hour rolling average, facility shall demonstrate that SO₂ removal efficiency is at least 80% as measured by EPA Methods 1-4 and 6C, based on the measurement of the inlet and outlet SO₂ concentrations. [40 CFR Part 64]

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



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™
COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2073-4-0

ISSUANCE DATE: 01/24/2013

LEGAL OWNER OR OPERATOR: COVANTA STANISLAUS, INC
MAILING ADDRESS: PO BOX 278
CROWS LANDING, CA 95313

LOCATION: 4040 FINK RD
CROWS LANDING, CA 95313

EQUIPMENT DESCRIPTION:
175 BHP CLARKE/JOHN DEERE MODEL JU6H-UFADMG TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE
POWERING A FIRE PUMP

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Permit to Operate N-2073-2 shall be cancelled upon the implementation of this Authority to Construct into a Permit to Operate. [District Rule 2201]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
7. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR Part 63 Subpart ZZZZ]
8. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
N-2073-4-0 : Jan 24 2013 2:50PM - HARADERJ : Joint Inspection NOT Required

9. Emissions from this IC engine shall not exceed any of the following limits: 2.5 g-NO_x/bhp-hr, 1.0 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ]
10. Emissions from this IC engine shall not exceed 0.09 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ]
11. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ]
12. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
13. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rules 4102 and 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ]
14. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
15. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
16. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ]

ATTACHMENT C

Detailed Facility List

Detailed Facility Report

For Facility=2073

Sorted by Facility Name and Permit Number

COVANTA STANISLAUS, INC		FAC #	N 2073		TYPE:	TitleV	EXP. ON:	10/31/2016
4040 FINK RD		STATUS:	A		TOXIC ID:	10746	AREA:	6 /
CROWS LANDING, CA 95313		TELEPHONE:	2098374423				INSP. DATE:	12/17

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2073-1-14	21.5 MW	3020-07 E	1	59,792.00	59,792.00	A	TWO 400 TON/DAY MUNICIPAL SOLID WASTE COMBUSTOR/BOILERS PRODUCING 21.5 MW OF ELECTRICITY EQUIPPED WITH DRY LIME SCRUBBERS, FLY ASH BAGHOUSE, AMMONIA INJECTION SYSTEM, LIME SLURRY INJECTION, ACTIVATED CARBON INJECTION SYSTEM, LIME AND SODA AND CARBON SILOS WITH FILTER VENTS, WASTE RECEIVING, ASH CONVEYING, AND ASH RESIDUE ENCLOSURE
N-2073-2-2	187 HP	3020-10 B	1	129.00	129.00	A	187 HP DIESEL EMERGENCY IC ENGINE SERVING THE MAIN FIRE PUMP

Number of Facilities Reported: 1

ATTACHMENT D

Public Comments and District Response

Oral Comments from the April 5, 2017 Public Hearing and District Responses

Do not approve Covanta Stanislaus Title V permit

1. We understand that the TV renewal doesn't authorize any additional emissions. We are objecting to the health risks we are already facing from the plant.

District Response:

As acknowledged by the commenter, the Title V permit renewal is a routine administrative action that does not authorize the modification of any existing equipment and does not authorize any increases in emissions. The purpose of the Title V permit renewal is to review and update the facility's existing operating permit to ensure that their permit contains sufficient conditions to enforce all currently applicable Federally-enforceable air quality regulations. A review of the existing health risk from the plant is outside the scope of a Title V permit renewal and is not one of the requirements that the District is authorized to use as a basis for renewal of a Title V permit pursuant to 40 CFR Part 70 and District Rule 2520.

However, separately, the Air District does routinely review the health risk from existing facilities under a state law that is not a part of the Title V permitting program. Specifically, AB2588, the Air Toxics "Hot Spots" Information and Assessment Act, requires an assessment of the health risk posed by a facility's air emissions, and requires a public notice and a reduction in risk for facilities that are determined to pose a significant risk to the public. Covanta Stanislaus has been repeatedly evaluated under the Air Toxics "Hot Spots" Information and Assessment Act, and the facility has never been found to pose a significant risk to the public.

2. Covanta Stanislaus emits 300 tons of NOx/year, which is more than Chevron. Covanta emits more PM2.5 than 3 coal plants combined. Covanta emits HAP emissions. We are an area with high rates of lung disease and asthma.

District Response:

Covanta's permit for the municipal solid waste-fired combustors includes limits for NOx, particulate matter, and HAP emissions. Covanta is operating in compliance with each of these emission limits. Furthermore, there are no provisions in 40 CFR 70 or District Rule 2520 that would allow the District to arbitrarily adjust the emission limits for the plant during a Title V renewal. The addition or revision of emission limits during a Title V renewal is limited to the

incorporation of emission limits from new or revised federally enforceable regulations into the Title V permit.

3. Covanta burns many gallons of diesel fuel per year. As the plant ages, they burn more and more diesel fuel, which increases health risk to the community.

District Response:

Covanta's Title V permit includes permit conditions limiting the amount of fuel oil #2 combusted in each combustor. These permit limits are designed to ensure that Covanta operates in compliance with all applicable regulations, and Covanta is operating in compliance with their permitted limits.

4. Cumulative impact of all the health risks should be considered. This area has many sources of pollution, including highway 5 and highway 33. The cumulative risks aren't taken into account in the District's decision making process.

District Response:

As described in earlier responses, the Title V permit renewal is a routine administrative action. There is no basis in law that would authorize the District to consider cumulative risks during the Title V permit renewal process.

5. Why does Covanta only perform one source test per year?

District Response

The District considers statutory requirements for testing, the nature of the emission control equipment, the expected margin of compliance, the reliability of the emission factors, and source testing feasibility when establishing the source test frequencies. In the case of many of the federally enforceable emission limits on Covanta's permit for the combustors, statutory requirements (District Rule 4352 and 40 CFR 60 Subpart Cb) require testing be performed on an annual basis.

However, source testing isn't the only method used to verify on-going compliance. Covanta uses continuous emission monitoring systems (CEMs) to monitor NO_x, SO₂, CO, CO₂ and opacity on a real-time basis. Continuous emissions monitoring is equivalent to source testing all year long, every year. Source testing for these continuously monitored pollutants is only needed as a back-up and to validate the continuous monitor data. Additionally, the

facility monitors other parameters that have been shown to have a direct correlation to emissions. For instance, Covanta monitors the combustor roof temperature and flue-gas temperature at the baghouse inlet of each combustor. Furnace roof temperature and the flue gas inlet temperature are surrogate parameters to ensure that hazardous air pollutant emissions, especially of mercury and dioxins/furans, are maintained below the permitted limits.

6. Why does the District notify the facility before the source test?

District Response:

Source testing is not conducted directly by the District. Rather, source testing is conducted by 3rd party California Air Resources Board-certified contractors hired by the facility. The District's Compliance Division oversees and audits the entire source testing process to ensure the 3rd party contractor follows the proper source test protocols and to ensure that the results are accurate and representative of the facility's operations.

Furthermore, source testing at a facility without any prior notification isn't practical, nor is it feasible. The 3rd party contractor must understand the operation thoroughly in order to propose an approvable testing protocol that will result in a valid source test. Additionally, the 3rd party contractor must know the physical arrangement of the site to ensure they bring the proper equipment to complete the source test and ensure the safety of their employees. Finally, the 3rd party contractor must ensure that the source will be operating the equipment within the parameters outlined in the source test protocol, which can't be guaranteed if testing were performed without any notification.

Finally, note that the facility has a continuous emissions monitoring system, as described in the response to question 5, above.

Title VI/Civil Rights

7. Notice in the newspaper was only in English and was published in the Modesto bee. Modesto is 30 miles away; notice should have been posted in a local publication, such as the "Patterson Irrigator". Spanish speaking community doesn't read Modesto bee. The Spanish notice should be published in a publication like "Vida en el Valle", channel 19 news, or the radio.

District Response:

The District properly published these notifications in the Modesto Bee, which is the major newspaper in general circulation in Patterson and in the other communities located near the Covanta Stanislaus facility. This notification is all that is required by the District's EPA-approved Title V permit renewal public notification processes.

However, in fact, the District went far beyond its required notification processes for this project by publishing these notices, as it does with all public notices, on the District's website, <http://www.valleyair.org>. This is not required by any rule or regulation, but is part of the District's continuing effort to make information readily available and accessible to as many people as possible. The notification was posted in English and Spanish on the District's English and Spanish language website, with specific contact information for Spanish speakers.

Additionally, the District website allows the public to request to be notified of any public notices occurring at a specific facility and/or to request to be notified of all public notices in a region or in the entire District. The instructions to request such notifications are available in both English and Spanish at the following links:

English:

http://www.valleyair.org/busind/pto/Permitting_Notification.htm

Spanish:

http://www.valleyair.org/General_info/SpanishHmong_Resources.htm

All persons who have requested that they receive notice of permitting actions involving Covanta, or permitting actions in the Northern Region of the District, or permitting actions anywhere in the District, received the District's notice of intended action in a timely manner, and received it in English and Spanish.

Finally, the District subsequently published a bilingual (Spanish/English) notification of the proposed Title V Permit Renewal in both the Latino Times on May 5, 2017 and Vida en el Valle on May 10, 2017, and the District extended the public commenting period to June 12, 2017. No comments were received during the extended comment period.

In summary, not only did the District's outreach to the community for this project comply with all applicable regulatory public noticing requirements, it went well beyond those requirements in an effort to ensure that all interested parties had an opportunity to take part in the permitting process.

8. This area is an environmental justice community per Cal Enviroscreen. The District should not allow the plant in an environmental justice community.

District Response:

Covanta Stanislaus is an existing facility that has been in existence for over 25 years at this location. As described earlier, the Title V renewal is a routine, administrative action that does not authorize any modifications to the equipment, nor does it authorize any increases in emissions from the facility. Finally, the federal regulations that guide the District's actions in this administrative process do not authorize the District to rescind the operating permit.

9. More information, such as renewal evaluation, should be translated into Spanish, for Spanish speaking community.

District Response:

See the answer to comment 7 above for a fuller discussion of the District's ongoing efforts to reach out to the Spanish speaking population of the San Joaquin Valley. However, please note that we offer to arrange for a Spanish speaking engineer familiar with the project to be available to discuss the specific details of proposed projects in Spanish. For instance, we made this offer in the notices that we published for this project in the Latino Times and Vida en el Valle. We received no such requests. In the absence of such requests, we believe it would be an extremely poor use of public resources to translate engineering and regulatory analyses that often are over 100 pages long, into Spanish.

10. The District is not complying with Title VI civil rights.

District Response:

The District disagrees. See above.

Availability of Information

11. We don't have easy access to the emission data for Covanta. Where is the data and how can we see it. The District should make it easier to access the data. There should be a link on the District website where we can view the real-time data for emissions from the facilities in the District if they have a CEMS.

District Response:

Emissions and monitoring data for Covanta Stanislaus is readily available and may be obtained by submitting a public record release request form to the District by mail, fax, or email, or directly through the District website. For instructions and a copy of the public record release request form, please visit the District's public records release page on the District website:

[http://www.valleyair.org/General info/public records release request.htm](http://www.valleyair.org/General%20info/public%20records%20release%20request.htm)

Annual emissions data, including emissions of toxic air contaminants, is readily available through from the California Air Resources Board at the following web address:

<https://www.arb.ca.gov/app/emsinv/facinfo/facinfo.php>

12. District should make it easier to view notice of violations for facilities. Ideally, should be a link to this information on the District Website. We want to know how many violations Covanta has had.

District Response:

A summary of the compliance history for Title V facilities is already available online through EPA's Enforcement and Compliance History Online (ECHO) website (<https://echo.epa.gov/>). If more detailed information is required for the notices of violation, the compliance history of a facility is available via a public record release request as discussed above.

As the District stated during the public hearing, Covanta Stanislaus doesn't have a history of non-compliance and was issued only one Notice of Violation (NOV) since the previous Title V renewal. That particular NOV was not an emissions violation. It was issued in 2016 for the use of an expired SO₂ calibration gas during the annual compliance source test and annual relative accuracy test audit (RATA). The facility has since resolved the issue.

13. We have a right to know what Covanta burns and where it comes from. Please provide us this data. This data was provided in the past when the plant was ran by Ogden Martin and they were burning toner cartridges from Washington State. Covanta is burning industrial trash from outside the area.

District Response:

Covanta's Title V permit includes a condition that restricts the burning of hazardous materials in the combustors; however, there are no federal or local air quality regulations that require Covanta to provide the District with an itemized list of the non-hazardous waste burned and the sources of the non-hazardous waste. Potential sources of the data you are seeking are:

Cal Recycle (<http://www.calrecycle.ca.gov/>)

Stanislaus County Environmental Resources (<http://www.stancounty.com/er/>)

Landfill waste/Recycling

14. Covanta's fly ash includes toxic waste, but the waste isn't disposed of in a hazardous waste landfill.

District Response:

The California Department of Health Services (now the California Department of Toxic Substances Control) previously classified the fly ash from Covanta's municipal solid waste combustors as nonhazardous pursuant to California Code of Regulations (CCR) Section 66305(d). The District doesn't regulate toxic waste disposal and suggests you contact the following agencies with these concerns:

California Department of Toxic Substances Control (<http://dtsc.ca.gov/>)

15. The plant burns material that is recyclable. The plant gets waste from Modesto, which doesn't have blue recycle bins like other communities, so the recyclables aren't filtered out. The result is that large quantities of metal are burned by the plant.

District Response:

The District does not have the authority to regulate waste disposal methods and waste recycling programs. Cal Recycle is responsible for regulating waste disposal sites and establishing waste diversion requirements. The City of Modesto is responsible for waste collection in Modesto. We suggest contacting the following agencies with these concerns:

Cal Recycle (<http://www.calrecycle.ca.gov/>)

City of Modesto (<http://www.modestogov.com>)

With respect to metals burned in the plant, the permit includes limits for metals and metalloids, including antimony, arsenic, beryllium, cadmium, chromium +6, copper, manganese, mercury, nickel, selenium, vanadium, and zinc, and the facility has been operating in compliance with these permit limits.

16. Waste should be landfilled or composted. This would be better for the environment. Covanta's arguments that they are diverting waste from landfill are not valid. It is better to landfill, generate methane, and burn the methane for energy.

District Response:

The District does not have the authority to regulate waste disposal methods and waste recycling programs. Cal Recycle is responsible for regulating waste disposal sites and establishing waste diversion requirements. We suggest contacting the following agency with these concerns:

Cal Recycle (<http://www.calrecycle.ca.gov/>)

Written Comments from Thomas Helme and District Responses

1. There are 3 “trash” incinerators (“waste-to-energy”) in CA, 2 in LA-area (Long Beach & Commerce), 1 in Crows Landing, Covanta owns 2 of the 3. The incinerator in Crows Landing burns 800 tons of “trash” every day. It was the only incinerator (of the 3 in CA) that is allowed to call its energy “renewable energy” and sell it at a higher price, fulfilling various quotas for creating real renewable energy (solar, wind, etc. for the state and local portfolios.

District Response

Covanta Stanislaus has been operating in compliance with their permitted production limits. With regards to the renewable energy designation for the California Renewables Portfolio Standard (RPS), the District does not regulate that program. The California Public Utilities Commission (CPUC) implements and administers RPS compliance rules for California’s retail sellers of electricity. The California Energy Commission (CEC) is responsible for the certification of electrical generation facilities as eligible renewable energy resources, and adopting regulations for the enforcement of RPS procurement requirements for Publically Owned Utilities (POUs). The District suggests you contact the following agencies with these concerns:

California Public Utilities Commission (<http://cpuc.ca.gov>)

California Energy Commission (<http://energy.ca.gov>)

2. Covanta Stanislaus emits about 300 tons of NOx (Nitrogen Oxide) every year (305 in 2015, compared to 355 for all Chevron facilities in the San Joaquin Valley).

District Response

Covanta’s permit for the municipal solid waste-fired combustors includes limits for NOx emissions and Covanta is operating in compliance with their NOx emission limits. Furthermore, there are no provisions in 40 CFR 70 and District Rule 2520 that would allow the District to arbitrarily adjust the emission limits for the plant during a Title V permit renewal. The addition or revision of emission limits during a Title V permit renewal is limited to the incorporation of emission limits from new or revised federally enforceable regulations into the Title V permit.

3. Local municipalities receive a 10% waste-diversion credit for burning trash, allowing them not to divert waste in other ways, like recycling, composting, and re-using.

District Response

Cal Recycle is responsible for regulating waste disposal sites and establishing waste diversion requirements. We suggest contacting Cal Recycle with your concerns regarding waste diversion and the waste-diversion credit.

Cal Recycle (<http://www.calrecycle.ca.gov/>)

4. Covanta Stanislaus emits more direct PM 2.5 than 3 coal plants combined:

District Response

Covanta's permit for the municipal solid waste-fired combustors includes limits for particulate emissions and Covanta is operating in compliance with their particulate emission limits. Furthermore, there are no provisions in 40 CFR 70 and District Rule 2520 that would allow the District to arbitrarily adjust the emission limits for the plant during a Title V permit renewal. The addition or revision of emission limits during a Title V permit renewal is limited to the incorporation of emission limits from new or revised federally enforceable regulations into the Title V permit.

5. Covanta Stanislaus also emits Carbon Monoxide, Sulfur Dioxide, Hydrogen Chloride, Cadmium, Lead, Mercury, Ammonia, and Dioxin (a deadly toxin used in "Agent Orange")

District Response

Covanta's permit for the municipal solid waste-fired combustors includes emission limits and testing/monitoring requirements for Carbon Monoxide, Sulfur Dioxide, Hydrogen Chloride, Cadmium, Lead, Mercury, Ammonia, and Dioxins. Covanta is operating in compliance with each of these emission limits. Furthermore, there are no provisions in 40 CFR 70 and District Rule 2520 that would allow the District to arbitrarily adjust the emission limits for the plant during a Title V permit renewal. The addition or revision of emission limits during a Title V permit renewal is limited to the incorporation of emission limits from new or revised federally enforceable regulations into the Title V permit.

6. In 2015, the Covanta Bio-Mass incinerator in Delano was fined \$30,000 for 7 emission violations.

District Response

The Covanta Delano facility has been shut down. This proposed Title V permit renewal is for Covanta Stanislaus, which is a different stationary source. Covanta Stanislaus has been operating in compliance with their emission limits.

7. Covanta Stanislaus uses 10 gallons of diesel fuel per hour every time the boiler is stopped and started.

District Response

Covanta's Title V permit includes permit conditions limiting the amount of fuel oil #2 combusted in each combustor. These permit limits are designed to ensure that Covanta operates in compliance with all applicable regulations, and Covanta is operating in compliance with their permitted limits.

8. Covanta representatives have told local advocates for years that recyclable and compostable material was sorted out of the waste stream before being taken to the incinerator, but after touring Covanta and the local waste facilities (Gilton and Bertolotti) it was obvious that a lot of these materials are in fact burned. In fact, Bertolotti said that they don't sort anything out of residential trashcans (black bins), there were plenty of visible recyclable and compostable materials being burned (they do recycle metal, but only after it is burned). Burning recyclable materials means that more new, raw material will need to be created (plastic, etc.)

District Response

Covanta's permit includes a condition that restricts the burning of hazardous materials in the combustors. There is no local, State, or Federal air quality regulation that restricts a municipal solid waste combustion unit from burning recyclable or compostable materials. We suggest contacting the following agencies with these concerns.

Cal Recycle (<http://www.calrecycle.ca.gov/>)

Stanislaus County Environmental Resources (<http://www.stancounty.com/er/>)

9. Covanta also burns industrial trash from outside the area.

District Response

There are no federal, state, or local air quality regulations that would prevent Covanta from burning industrial trash from outside the area.

10. Covanta's argument is that they are keeping trash out of the landfill, which releases methane, but only 2% of methane in CA comes from landfills (40% comes from dairies) and if the recyclable/compostable/re-usable stuff was diverted it wouldn't go to the landfill anyway. Also, it may be possible that the methane could be captured and used as energy, eliminating the emissions. (Methane needs to make up 30% of the landfill's emissions in order to make capturing it worthwhile, or local landfill is at 18-24%.

District Response

Methane is a greenhouse gas (GHG) and was not a subject of this title V permit renewal, so the District is unclear about the statement about "Covanta's argument". If the commenter is interested in methane or other GHG emissions from Covanta, we would refer them to the California Air Resources Board, who requires tracking and reporting of GHG emissions. In addition, the California Public Utilities Commission (CPUC) implements and administers some related GHG compliance rules for California's retail sellers of electricity. The California Energy Commission (CEC) is responsible for the certification of electrical generation facilities as eligible renewable energy resources, and adopting regulations for the enforcement of procurement requirements for Publically Owned Utilities (POUs). The District suggests you contact the following agencies with your concerns regarding greenhouse gas emissions:

California Air Resources Board (<http://arb.ca.gov>)

California Public Utilities Commission (<http://cpuc.ca.gov>)

California Energy Commission (<http://energy.ca.gov>)

11. Ash created (called "fly ash") is considered toxic waste containing lead, cadmium, zinc, copper, and nickel, put in local landfill.

District Response

The California Department of Health Services (now the California Department of Toxic Substances Control) previously classified the fly ash from Covanta's municipal solid waste combustors as nonhazardous pursuant to California Code of Regulations (CCR) Section 66305(d). The District doesn't regulate

toxic waste disposal and suggests you contact the following agencies with these concerns:

California Department of Toxic Substances Control (<http://dtsc.ca.gov/>)

12. When NO_x (emitted by Covanta) and volatile organic compounds (VOCs) react in the presence of sunlight, they form "Ozone" (harmful air pollution especially in summer). Children, people with lung diseases such as asthma, and people who work or exercise outside are particularly susceptible to adverse, such as damage to lung tissue and reduction in lung function. The San Joaquin Valley has the worst air quality in the nation, especially in the south end of the valley, our pollution in the north adds to that, harming the health of ourselves and our neighbors. The American Lung Association ranks the Modesto/Merced area #7 in worst ozone pollution, #6 in year round particulate pollution, and #4 in short-term particulate pollution in the entire United States.

District Response

The District is well aware of the causes and sources of the region's air quality issues and has adopted the most stringent air quality regulations anywhere in the nation to control emissions from those sources. However, the Title V permit renewal is an administrative action that doesn't provide a mechanism to arbitrarily adjust emission limits. The addition or revision of emission limits during a Title V renewal is limited to the incorporation of emission limits from new or revised federally enforceable regulations into the Title V permit.

13. The west-side of Stanislaus County is an EJ community according to CalEnviroScreen and has historically been a low-income, Latino, farmworker community (Latino children in the US are 40% more likely to develop asthma and other respiratory problems)

District Response

The District is aware of CalEnviroScreen and is supportive of its use in determining allocation of resources that are intended to assist Environmental Justice communities. In recognition of the area's EJ issues and concerns, the District provided extensive Spanish language outreach to the area regarding our proposed permitting decision. See responses above (especially to oral comment number 7) for more information.

14. Sources of air pollution in the area: Fwy 5, Hwy 33, Hwy 99 nearby, the landfill, trash incinerator, multiple distribution centers/warehouses (Amazon, Restoration Hardware, CVS, etc.), pesticide spraying in ag areas, and all the trucks associated with ag and other sources mentioned transporting goods in and out constantly, we need to think of the cumulative effects in these areas

District Response

As described in earlier responses, the Title V permit renewal is an administrative action. There is no basis in law that would authorize the District to consider the suggested cumulative effects during the Title V renewal process.

15. Modesto is one of the largest cities in CA with no curbside recycling (blue bin, there is a green bin for organic waste), it seems obvious that this due to a for-profit company needing 800 tons of waste to burn every day. This does not help create a culture and practice of recycling and thinking about the materials we use.

District Response

The District does not have the authority to regulate waste disposal methods and waste recycling programs. Cal Recycle is responsible for regulating waste disposal sites and establishing waste diversion requirements. The City of Modesto is responsible for waste collection in Modesto. We suggest contacting the following agencies with these concerns:

Cal Recycle (<http://www.calrecycle.ca.gov/>)

City of Modesto (<http://www.modestogov.com>)

16. Standards for waste diversion are increasing to 75%, Covanta faces losing its "renewable energy" status, new technologies for recycling, composting, and re-using materials, as well as capturing methane from landfills are being created all the time. Burning trash is a thing of the past, let's move onto the future

District Response

The District does not have the authority to regulate waste disposal methods and waste recycling programs. Cal Recycle is responsible for regulating waste disposal sites and establishing waste diversion requirements. The City of Modesto is responsible for waste collection in Modesto. We suggest contacting the following agencies with these concerns:

Cal Recycle (<http://www.calrecycle.ca.gov/>)

City of Modesto (<http://www.modestogov.com>)

Written Comments from John Mataka,
President of the Grayson Neighborhood Council
And District Responses

1. Covanta emits about 300 tons of NOX every year. In 2015 Covanta emitted 305 tons of NOX compared to 335 tons of NOX emitted by all of the Chevron facilities in the San Joaquin Valley.

District Response

Covanta's permit for the municipal solid waste-fired combustors includes limits for NOx emissions and Covanta is operating in compliance with their NOx emission limits. Furthermore, there are no provisions in 40 CFR 70 and District Rule 2520 that would allow the District to arbitrarily adjust the emission limits for the plant during a Title V permit renewal. The addition or revision of emission limits during a Title V permit renewal is limited to the incorporation of emission limits from new or revised federally enforceable regulations into the Title V permit.

2. Covanta emits more PM 2.5 than 3 coal plants combined.

District Response

Covanta's permit for the municipal solid waste-fired combustors includes limits for particulate emissions and Covanta is operating in compliance with their particulate emission limits. Furthermore, there are no provisions in 40 CFR 70 and District Rule 2520 that would allow the District to arbitrarily adjust the emission limits for the plant during a Title V permit renewal. The addition or revision of emission limits during a Title V permit renewal is limited to the incorporation of emission limits from new or revised federally enforceable regulations into the Title V permit.

3. Covanta also emits Carbon Monoxide, Sulfur Dioxide, Hydrogen Chloride, Cadmium, Lead Mercury, Ammonia, and Dioxin -a deadly chemical used in Agent Orange.

District Response

Covanta's permit for the municipal solid waste-fired combustors includes emission limits and testing/monitoring requirements for Carbon Monoxide, Sulfur Dioxide, Hydrogen Chloride, Cadmium, Lead, Mercury, Ammonia, and Dioxins. Covanta is operating in compliance with each of these emission limits. Furthermore, there are no provisions in 40 CFR 70 and District Rule 2520 that would allow the District to arbitrarily adjust the emission limits for the plant during a Title V permit renewal. The addition or revision of emission limits during a Title V permit renewal is limited to the incorporation of emission limits from new or revised federally enforceable regulations into the Title V permit.

4. Covanta ash called fly ash is considered toxic waste containing lead, cadmium, zinc, copper, and nickel. This is a violation because the Fink Road Landfill landfill [sic].

District Response

The District believes the commenter was attempting to state that the fly ash is toxic waste and cannot be disposed of at Fink Road Landfill, since the landfill only accepts non-hazardous waste. The California Department of Health Services (now the California Department of Toxic Substances Control) previously classified the fly ash from Covanta's municipal solid waste combustors as nonhazardous pursuant to California Code of Regulations (CCR) Section 66305(d), which may be disposed of at Fink Road Landfill. The District doesn't regulate toxic waste disposal and suggests you contact the following agencies with these concerns:

California Department of Toxic Substances Control (<http://dtsc.ca.gov/>)

5. The Westside of Stanislaus County is an EJ community according to the Cal-Enviro Screen and has historically been low income, Latino, Spanish speaking and farmworker community. Latino children in the US are 40% more likely to develop asthma and other respiratory problems.

District Response

The District is aware of CalEnviroScreen and is supportive of its use in determining allocation of resources that are intended to assist Environmental Justice communities. In recognition of the area's EJ issues and concerns, the District provided extensive Spanish language outreach to the area regarding our proposed permitting decision. See response to comment 11 below for more information.

6. The Covanta Incinerator is 30 years old and used 10 gallons of diesel fuel per hour every time the boiler is stopped and started.

District Response

Covanta's Title V permit includes permit conditions limiting the amount of fuel oil #2 combusted in each combustor. Covanta is operating in compliance with their permitted limits.

7. Covanta's argument that they are keeping trash out of the landfill which releases methane gas. Only 2 % of methane gas comes from landfills. 40% of methane gas comes from dairies.

District Response

Methane is a greenhouse gas (GHG) and was not a subject of this title V permit renewal, so the District is unclear about the statement about "Covanta's argument". If the commenter is interested in methane or other GHG emissions from Covanta, we would refer them to the California Air Resources Board, who requires tracking and reporting of GHG emissions. In addition, the California Public Utilities Commission (CPUC) implements and administers some related GHG compliance rules for California's retail sellers of electricity. The California Energy Commission (CEC) is responsible for the certification of electrical generation facilities as eligible renewable energy resources, and adopting regulations for the enforcement of procurement requirements for Publically Owned Utilities (POUs). The District suggests you contact the following agencies with your concerns regarding greenhouse gas emissions:

California Air Resources Board (<http://arb.ca.gov>)

California Public Utilities Commission (<http://cpuc.ca.gov>)

California Energy Commission (<http://energy.ca.gov>)

8. Sources of air pollution in our area are Freeway 5, Hwy 33, Hwy99, the landfill, Covanta, distribution centers ie Amazon, Restoration Hardware, CVS etc. Also pesticide spraying and truck traffic associated with agriculture and transportation of goods from warehouses.

District Response

As described in earlier responses, the Title V permit renewal is an administrative action. There is no basis in law that would authorize the District to consider these outside sources during the Title V permit renewal process.

9. Modesto is the largest city in Stanislaus County and it has no curbside recycling. It has green waste only. It is obvious that this is due to the City of Modesto needing to provide Covanta with 800 tons of trash a day.

District Response:

The District does not have the authority to regulate waste disposal methods and waste recycling programs. Cal Recycle is responsible for regulating waste disposal sites and establishing waste diversion requirements. The City of Modesto is responsible for waste collection in Modesto. We suggest contacting the following agencies with these concerns:

Cal Recycle (<http://www.calrecycle.ca.gov/>)
City of Modesto (<http://www.modestogov.com>)

10. We the community have a right to know what is being burned at Covanta and where it is coming from. We formally request a list of items being burned and location from where they are coming.

District Response:

Covanta's permit includes a condition that restricts the burning of hazardous materials in the combustors; however, there are no federal or local air quality regulations that require Covanta to provide the District with an itemized list of the non-hazardous waste burned and the sources of the non-hazardous waste. Potential sources of the data you are seeking are:

Cal Recycle (<http://www.calrecycle.ca.gov/>)
Stanislaus County Environmental Resources (<http://www.stancounty.com/er/>)

11. In conclusion we feel the Covanta Permit process is in violation of Federal Civil Rights due to the Notice of Hearing being put in only the Modesto Bee an English Newspaper that Spanish speaking residents do not read. Over 50 % of our community is Spanish speaking. The notice should have been put in the Spanish version of the Modesto Bee La Vida en El Valle. The notice should have been announced on Spanish TV and Radio also.

District Response:

The District properly published these notifications in the Modesto Bee, which is the major newspaper in general circulation in Patterson and in the other communities located near the Covanta Stanislaus facility. This notification is all that is required by the District's EPA-approved Title V permit renewal public notification processes.

However, in fact, the District went far beyond its required notification processes for this project by publishing these notices, as it does with all public notices, on the District's website, <http://www.valleyair.org>. This is not required by any rule or regulation, but is part of the District's continuing effort to make information readily available and accessible to as many people as possible. The notification was posted in English and Spanish on the District's English and Spanish language website, with specific contact information for Spanish speakers.

Additionally, the District website allows the public to request to be notified of any public notices occurring at a specific facility and/or to request to be notified of all public notices in a region or in the entire District. The instructions to request such notifications are available in both English and Spanish at the following links:

English:

http://www.valleyair.org/busind/pto/Permitting_Notification.htm

Spanish:

http://www.valleyair.org/General_info/SpanishHmong_Resources.htm

All persons who have requested that they receive notice of permitting actions involving Covanta, or permitting actions in the Northern Region of the District, or permitting actions anywhere in the District, received the District's notice of intended action in a timely manner, and received it in English and Spanish.

Finally, the District subsequently published a bilingual (Spanish/English) notification of the proposed Title V Permit Renewal in both the Latino Times on May 5, 2017 and Vida en el Valle on May 10, 2017, and the District extended the public commenting period to June 12, 2017. No comments were received during the extended comment period.

In summary, not only did the District's outreach to the community for this project comply with all applicable regulatory public noticing requirements, it went well beyond those requirements in an effort to ensure that all interested parties had an opportunity to take part in the permitting process.



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



Permit to Operate

FACILITY: N-2073

EXPIRATION DATE: 10/31/2021

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

COVANTA STANISLAUS, INC
PO BOX 278
CROWS LANDING, CA 95313

FACILITY LOCATION:

4040 FINK RD
CROWS LANDING, CA 95313

FACILITY DESCRIPTION:

MUNICIPAL SOLID WASTE COMBUSTOR

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

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

Sayed Sadredin
Executive Director / APCO

Arnaud Marjollet
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: N-2073-0-3

EXPIRATION DATE: 10/31/2021

FACILITY-WIDE REQUIREMENTS

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; Stanislaus County Rule 110; and PSD SJ 86-03] 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; Stanislaus County Rule 110; and PSD SJ 86-03] 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 9.12.1] 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: COVANTA STANISLAUS, INC
Location: 4040 FINK RD, CROWS LANDING, CA 95313
N-2073-0-3 Jul 14 2017 1:24PM - HARADERJ

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3 and PSD SJ 86-03] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4 and PSD SJ 86-03] 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 Stanislaus County Rule 401] 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. In the event of changes in control or ownership, this Operating Permit shall be binding on new owners and operators. The applicant shall notify successor of the existence of this Operating Permit and its conditions in writing and forward a copy to the District, California Air Resources Board, and EPA. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
42. The applicant shall construct and operate the facility in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State and District air quality regulations. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
43. All correspondence as required by this Operating Permit shall be forwarded to: the District; Director, Air & Toxics Div. (Attn: A-3-3), EPA Region 9, 75 Hawthorne St. San Francisco, CA 94105; and Director, Stationary Source Div., CARB, Box 2815, Sacramento, CA 95812. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
46. Compliance with permit conditions in the Title V permit shall be deemed compliance with following applicable requirements: 40 CFR 82 Subparts A, B, C, D, E and F. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. A permit shield from the requirements of District Rule 4106 (6/11/2001) is granted since this facility does not perform prescribed burning nor does the facility perform hazard reduction burning in a wildland or urban interface. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. A permit shield from the requirements of District Rule 4204 (2/17/05) is granted since this facility does not meet the definition of a cotton ginning facility. [District Rule 2520, 13.2] 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.

49. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1st 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: N-2073-1-16

EXPIRATION DATE: 10/31/2021

EQUIPMENT DESCRIPTION:

TWO 400 TON/DAY MUNICIPAL SOLID WASTE COMBUSTOR/BOILERS PRODUCING 21.5 MW OF ELECTRICITY EQUIPPED WITH DRY LIME SCRUBBERS, FLY ASH BAGHOUSE, AMMONIA INJECTION SYSTEM, LIME SLURRY INJECTION, ACTIVATED CARBON INJECTION SYSTEM, LIME AND SODA AND CARBON SILOS WITH FILTER VENTS, WASTE RECEIVING, ASH CONVEYING, AND ASH RESIDUE ENCLOSURE

PERMIT UNIT REQUIREMENTS

1. All equipment, facilities and systems installed or used to comply with the terms and conditions of this Permit to Operate shall be maintained in good working order and be operated as required to meet the conditions of this permit. Operator shall, on each boiler, continuously operate and maintain the following air pollution controls to minimize emissions: baghouse for the control of particulates; lime slurry dry scrubber for the control of SO₂ and acid gas emissions; and ammonia injection system for the control of NO_x emissions. [District Rule 2080 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
2. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. The baghouse shall have a maximum effective air-to-cloth ratio of 4:1 and shall be equipped with an automatic cleaning mechanism. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest individual combustion unit baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions from any location other than designated vents on refuse receiving, processing or storage buildings at any time, except as provided in this permit to operate. Visible emissions shall be inspected quarterly under material and environmental conditions, such as dry and windy, where high emissions are expected. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
6. Paved areas shall be kept free of visible dust at all times and shall be vacuum swept at least once every fourteen days. Records of vacuum sweeping shall be maintained and made available to the District upon request. [District Rule 4102]
7. The NO_x control system shall be in full use whenever this equipment is fired with MSW. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The total PM₁₀ emissions from the ash handling system (including ferrous and non-ferrous material recovery operations) inside the ash enclosure shall not exceed 1.2 pounds in any one day and 402 pounds in any rolling 12 consecutive month period. The permittee shall maintain records sufficient to demonstrate compliance with these limits. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The PM₁₀ emissions from the non-ferrous material recovery equipment in the ash enclosure shall not exceed 183 pounds in any rolling 12 consecutive month period. The permittee shall maintain records sufficient to demonstrate compliance with this limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rule 2201] Federally Enforceable Through Title V Permit

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10. The ash shall be handled in such a manner as to mitigate fugitive emissions to the maximum extent possible. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
11. The facility shall not cause visible emissions from ash conveying systems, including transfer points, in excess of 5% of the observation period, as determined by performing EPA Method 22 on a quarterly basis. Fugitive ash emissions do not include emissions within a building, an enclosed ash conveyor, or during periods of maintenance and repair of the ash conveyor systems. [40 CFR 60.36b] Federally Enforceable Through Title V Permit
12. Fuel Oil #2, with a sulfur content not to exceed 0.25% by weight, may be used as necessary to maintain the minimum combustion zone temperature requirements and annual usage shall not exceed 1,108,321 gallons for each combustor. [District NSR Rule, 40 CFR 60. 44b(c) & PSD SJ 86-03] Federally Enforceable Through Title V Permit
13. A furnace roof temperature of 1,100 degrees F shall be stabilized, as measured by multiple thermocouples, to ensure that a minimum temperature of 1,800 degrees F is established above the grate prior to the ignition of MSW. [District NSR Rule] Federally Enforceable Through Title V Permit
14. During any period of time that MSW is burning on the grates, the combustion gas retention time shall be maintained at a minimum of one second, the combustion zone temperature shall be maintained at a minimum of 1,800 degrees F, and the furnace roof temperature shall be maintained at an average (4 hour arithmetic block) of 1,100 degrees F, except during periods of start-up, shutdown, and malfunction, as defined in 40 CFR 60.58b(a). [District NSR Rule] Federally Enforceable Through Title V Permit
15. Hazardous materials shall not be burned in this equipment. Hazardous materials are that portion of solid waste which, by reason of its composition or characteristics, is: (a) hazardous waste as defined in the Solid Waste Disposal Act, 42 USC section 6901 et. seq., and the regulations thereunder, the California Health & Safety Code, Div. 20, Chs. 6.5, 6.7, and 6.8 (section 25100 et. seq.), the California Code of Regulations, Title 22, Div. 4.5, and any similar or substituted legislation or regulations or amendments to the foregoing; (b) any other materials which any governmental agency or unit having appropriate jurisdiction shall determine from time to time is harmful, toxic, or dangerous, or otherwise ineligible for disposal through the facility; and (c) any material, other than residential or commercial solid waste of the type historically collected by the County and the City as acceptable for disposal into non-hazardous waste landfills, which would result in process residue being hazardous waste under (a) or (b) above. [District Rule 4102]
16. The facility shall develop and annually update a site-specific operating manual in accordance with 40 CFR 60.54b(e). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
17. Each operator and all maintenance personnel shall receive initial and annual training on the site-specific operating manual in accordance with 40 CFR 60.54b(f). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
18. The site-specific operating manual and operating manual training records shall be accessible to all operations and maintenance personnel and shall be made available to the enforcement agency upon request. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
19. The District reserves the right to require the permittee to re-evaluate the health risk assessment if there is a significant change in population locations as projected in the currently approved health risk assessment, or new health data becomes available. [District Rule 4102]
20. During any 3-hour periods of startup, shutdown, and malfunction, the facility shall be exempt from emission limits identified in this permit which are based upon 40 CFR 60 Subpart Cb or Subpart Eb. This exemption shall not apply to CO emission limits of 40 CFR 60.53b(a) if the malfunction is a loss of boiler water level control. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Opacity exhibited by the gases discharged to the atmosphere from each combustion unit, other than water vapor, shall not exceed 10 percent based on a six minute average as measured by EPA Method 9. [40 CFR 60.33b and 40 CFR Part 64] Federally Enforceable Through Title V Permit
22. The carbon monoxide (CO) emissions from each combustion unit shall not exceed 100 ppmv, dry, corrected to 7% O₂, as measured utilizing EPA Methods 1-4 and 10. Compliance with this limit shall be determined based on a four hour block arithmetic average as defined in 40 CFR 60.51b. [District Rule 4352 and 40 CFR 60.34b] Federally Enforceable Through Title V Permit

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23. The NO_x emissions from each combustion unit shall not exceed 200 ppmv, dry, corrected to 12% CO₂ as measured by EPA Methods 1-4 and 7E. Compliance with this limit shall be determined based on an eight rolling hour average. [District NSR Rule, District Rule 4352, and 40 CFR 60.33b] Federally Enforceable Through Title V Permit
24. Either the SO₂ emissions from each combustion unit shall not exceed 30 ppmv, dry, corrected to 12% CO₂, based on an eight hour rolling average, or the SO₂ removal efficiency shall be at least 80% as measured by EPA Methods 1-4 and 6C. The SO₂ 80% removal efficiency shall be based on the measurement of the inlet and outlet SO₂ concentrations, corrected to 12% CO₂. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The SO₂ emissions from each combustion unit shall not exceed 29 ppmv, dry, corrected to 12% CO₂, or the SO₂ removal efficiency shall be at least 75% (by weight or volume), whichever is less stringent as measured by EPA Methods 1-4 and 6C. Compliance with this limit shall be determined based on a 24-hour daily geometric mean. EPA method 19 shall be used to calculate the daily geometric average sulfur dioxide emission concentration and removal efficiency. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
26. Particulate matter emissions from each combustion unit shall not exceed 0.0275 gr/dscf, corrected to 12% CO₂, as measured by EPA Methods 1 through 5, including the condensable portion in the "back-half". [District NSR Rule] Federally Enforceable Through Title V Permit
27. Filterable particulate matter (i.e. front half) emissions from each combustion unit shall not exceed any of the following emission limits: 0.011 gr/dscf, corrected to 12% CO₂; 25 milligrams/dscf, corrected to 7% O₂; 0.10 lb/MMBtu heat input. Owner or operator shall conduct a performance test for particulate matter on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) with EPA Method 1; EPA Method 3, 3A, or 3B; and EPA Method 5. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than 160 degrees C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run. [District NSR Rule, 40 CFR 60.33b, 40 CFR 60.38b, and 40 CFR 60.43b(d)(1)] Federally Enforceable Through Title V Permit
28. Filterable particulate matter emissions from each combustion unit shall not exceed 0.008 gr/dscf, corrected to 12% CO₂, for the fraction of particles less than 2μ in diameter, as measured by Andersen Cascade Impactor, Flow Sensor Multiclone or any other equivalent measurement as validated by EPA Method 301. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Each combustion unit shall only be allowed to emit half of the total allowable (mass) emission rate for each pollutant. [District NSR Rule] Federally Enforceable Through Title V Permit
30. The CO emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
31. The CO emissions shall not exceed 121.9 tons/yr. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
32. The NO_x emissions shall not exceed 2,260 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
33. The NO_x emissions shall not exceed 344.4 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
34. The SO₂ emissions shall not exceed 800 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
35. The SO₂ emissions shall not exceed 121.9 tons/year. The annual emissions shall be computed on a daily (i.e. 24 hours) basis and shall be running total of the latest 8,760 hours. [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit

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36. The PM emissions shall not exceed 475 pounds in any one day. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.16}$ if P is greater than 30 tons per hour. Particulate emissions shall be no more than 0.1 lbs per 100 lbs of combustible refuse charged. [District Rules NSR, 4202, and 4203, 4.3] Federally Enforceable Through Title V Permit
37. The PM emissions shall not exceed 72.4 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The combined post-control PM10 emissions from the combustion units shall not exceed 70 ton/yr. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
39. Emissions of combustion contaminants from each fuel burning equipment unit shall not exceed 0.1 gr/dscf, corrected to 12% CO₂, and 10 lb/hr. Combustion contaminants are defined as total PM (filterable plus condensable) minus the ammonium salts (e.g. ammonium chloride, ammonium sulfate, ammonium bisulfate, etc.) present in the condensable PM fraction. A "fuel burning equipment unit" is the minimum number of fuel burning equipment required to operate simultaneously for the production of useful heat. Compliance with this emission limit shall be demonstrated annually by source test conducted according to EPA Methods 5 and 202 (or other APCO approved methods). Ammonium salts in the condensable PM fraction shall be determined by analysis of the condensable PM fraction by ion chromatography (or other APCO approved method). [District Rule 4301] Federally Enforceable Through Title V Permit
40. The THC emissions shall not exceed 96 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
41. The THC emissions shall not exceed 14.6 tons/year. The annual emissions shall be computed on a monthly basis and shall be running total of the latest 12 months. [District NSR Rule] Federally Enforceable Through Title V Permit
42. The THC emissions (as CH₄) from each combustion unit shall not exceed 70 ppmv, dry, corrected to 12% CO₂ as measured by EPA Methods 1-4 and 25A. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Ammonia (NH₃) breakthrough of the exhaust shall not exceed 50 ppmv, dry, as measured by BAAQMD Method ST-1B. The facility shall be exempt from this condition for periods of start-up, shutdown, and malfunction as defined in 40 CFR 60.58b(a). [District Rule 4102]
44. The Antimony emissions from each combustion unit shall not exceed 0.0315 g/s as measured by CARB Method 436. [District Rule 4102]
45. The Arsenic emissions from each combustion unit shall not exceed 0.0005 g/s as measured by CARB Method 436. [District Rule 4102]
46. The Beryllium emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436. [District Rule 4102]
47. The Cadmium emissions from each combustion unit shall not exceed either of the following: 0.0013 g/s; 0.035 milligrams/dscf, corrected to 7% O₂; each as measured by EPA Methods 1, 3, and 29 [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
48. The Chromium +6 emissions from each combustion unit shall not exceed 0.00005 g/s as measured by CARB Method 436 (5% of the total chromium shall be considered to be hexavalent chromium). [District Rule 4102]
49. The Copper emissions from each combustion unit shall not exceed 0.155 g/s as measured by CARB Method 436. [District Rule 4102]
50. The Dioxin/Furan emissions from each combustion unit shall not exceed 30 ng/dscm (total mass), corrected to 7% O₂, as measured by EPA Method 23. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
51. The Dioxin/Furan emissions from each combustion unit shall not exceed 50 ng/s, based on the Department of Health Services toxic equivalent calculation. [District Rule 4102]
52. The Hydrogen Fluoride (HF) emissions from each combustion unit shall not exceed 0.05 g/s as measured by EPA Method 26. [District Rule 4102]

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53. The Hydrogen Chloride (HCl) emissions from each combustion unit shall not exceed either of the following: 1.4 g/s; 29 ppmv or the HCl removal efficiency shall be at least 95% (by weight or volume), whichever is less stringent, corrected to 7% O₂; each as measured by EPA Method 26. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
54. The Lead emissions from each combustion unit shall not exceed either of the following: 0.014 g/s; 0.400 milligrams/dscf, corrected to 7% O₂; each as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b and District Rule 4102] Federally Enforceable Through Title V Permit
55. The Manganese emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
56. The Mercury emissions from each combustion unit shall not exceed 0.050 mg/dscm, corrected to 7% O₂, or the mercury removal efficiency shall be at least 85% by weight, whichever is less stringent, as measured by EPA Methods 1, 3, and 29. [40 CFR 60.33b] Federally Enforceable Through Title V Permit
57. The Mercury emissions from each combustion unit shall not exceed 0.0025 g/s (3-hour average). [PSD ATC SJ 86-03 and District Rule 4102] Federally Enforceable Through Title V Permit
58. The Nickel emissions from each combustion unit shall not exceed 0.025 g/s as measured by CARB Method 436. [District Rule 4102]
59. The Selenium emissions from each combustion unit shall not exceed 0.055 g/s as measured by CARB Method 436. [District Rule 4102]
60. The Vanadium emissions from each combustion unit shall not exceed 0.15 g/s as measured by CARB Method 436. [District Rule 4102]
61. The Zinc emissions from each combustion unit shall not exceed 0.315 g/s as measured by CARB Method 436. [District Rule 4102]
62. The mass emission rates shall be calculated from the hourly stack concentrations and the volumetric flow rate using municipal solid waste Carbon Dioxide based F-factor of 1820 dscf/MMBtu (EPA Method 19, Table 19-2). [District NSR Rule & PSD SJ 86-03] Federally Enforceable Through Title V Permit
63. The total steam generated from each boiler shall not exceed 110% of the maximum demonstrated combustion unit load achieved in the most recent Dioxin/Furan performance test, as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
64. The maximum flue gas temperature, measured at the particulate matter control device inlet from each boiler, shall not be higher than 17 deg. C (31 deg. F) above the maximum demonstrated particulate matter control device temperature as defined in 40 CFR 60.51b. [40 CFR 60.34b(b)] Federally Enforceable Through Title V Permit
65. The steam load and particulate matter control device inlet flue gas temperature limitations shall apply at all times except during the annual Dioxin/Furan performance test, the two weeks preceding the annual Dioxin/Furan performance test, and when the facility obtains a waiver in accordance with permission granted by the Administrator or the Air Pollution Control Officer. [40 CFR 60.53b(b)] Federally Enforceable Through Title V Permit
66. The ammonia (NH₃) injection rate shall be measured and recorded continuously. [District NSR Rule] Federally Enforceable Through Title V Permit
67. The facility shall install, calibrate, maintain, and operate a carbon dioxide CEM at the economizer and stack locations of each combustion unit, in accordance with 40 CFR 60.58b(b) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
68. The facility shall install, calibrate, maintain, and operate a continuous opacity monitoring system in accordance with 40 CFR 60.13 and Appendix B. [40 CFR 60.38b and 40 CFR Part 64] Federally Enforceable Through Title V Permit
69. The facility shall install, calibrate, maintain, and operate a sulfur dioxide CEM at the stack locations in accordance with 40 CFR 60.58b(e) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit

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70. The facility shall install, calibrate, maintain, and operate a nitrogen oxides CEM at the stack locations in accordance with 40 CFR 60.58b(h) and Appendices B and F. [40 CFR 60.38b and District Rule 4352] Federally Enforceable Through Title V Permit
71. The facility shall install, calibrate, maintain, and operate a carbon monoxide CEM at the stack locations in accordance with 40 CFR 60.58b(i) and Appendices B and F. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
72. The facility shall install, calibrate, maintain, and operate a continuous steam flow monitoring and recording device and a device to measure temperature at the inlet of each particulate matter control device in accordance with 40 CFR 60.58b(i). [40 CFR 60.38b] Federally Enforceable Through Title V Permit
73. The permittee shall be responsible for providing the District access, via telemetry, to the stored computerized data associated with the continuous emission monitoring system. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
74. Continuous monitoring and recording equipment shall be provided for the following: No. 2 fuel oil burning rate and temperature. Each combustion unit shall have sufficient monitors to demonstrate combustion unit temperature profile as required in condition 13 and flue gas temperature into the particulate matter control device as required by condition 64. [District Rule 1080, 7.0] Federally Enforceable Through Title V Permit
75. In the event that monitoring or test data show that emissions from the facility exceed any emission limitation conditions of this Permit to Operate, the permittee shall take immediate corrective action to bring the plant's emissions within these limitations. [District NSR Rule] Federally Enforceable Through Title V Permit
76. Emissions in excess of those allowed by this permit shall be cause for the District to order an immediate reduction in fuel feed rate or to take other appropriate abatement action. [District Rule 2080] Federally Enforceable Through Title V Permit
77. The permittee shall notify the District of any emission violation by the next working day after such violation has occurred. [District Rule 2080] Federally Enforceable Through Title V Permit
78. Performance testing to demonstrate compliance with permit conditions shall be conducted annually (at least every calendar year but no later than 12 months from previous performance testing). The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved test methods. [District Rule 1081, 3.0, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
79. All emission measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in this Permit to Operate. [District Rule 4352] Federally Enforceable Through Title V Permit
80. No compliance determination shall be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352] Federally Enforceable Through Title V Permit
81. Performance testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any performance test, and a test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
82. The results of each performance test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
83. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO₂ on a dry basis: Oxides of nitrogen emissions; Total hydrocarbons, as methane; Carbon monoxide; Sulfur dioxide; Concentrations of gaseous ammonia (NH₃); and Exhaust flow rate, wet and dry. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
84. Performance tests shall include: Total particulate matter emission concentration corrected to 12% CO₂ and shall be conducted including the condensable portion in the "back half"; and Filterable particulate matter emission concentration corrected to 12% CO₂ and shall be conducted including only "front-half". If the measured Filterable particulate matter emission concentration is greater than 0.008 gr/dscf, corrected to 12% CO₂, testing shall be conducted to verify compliance with condition 28. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit

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85. Performance tests shall include a test of both combustion unit exhausts following the baghouse for the following parameters, corrected to 12% CO₂ on a dry basis: Polynuclear aromatic hydrocarbons (Benzo-A-Pyrene, Benzo-E-Pyrene, Benzo-A-Anthracene, and Coronene and PCB); and Dioxins and Furans. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
86. The following Dioxin isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDD; total tetra CDD; 1,2,3,7,8 penta CDD; total penta CDD; 1,2,3,4,7,8 hexa CDD; 1,2,3,6,7,8 hexa CDD; 1,2,3,7,8,9 hexa CDD; total hexa CDD; 1,2,3,4,6,7,8 hepta CDD; total hepta CDD; total octa CDD. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
87. The following Furan isomers & homologues shall be measured in both the combustion unit exhausts: 2,3,7,8 tetra CDF; total tetra CDF; 1,2,3,7,8 penta CDF; 2,3,4,7,8 penta CDF; total penta CDF; 1,2,3,4,7,8 hexa CDF; 1,2,3,6,7,8 hexa CDF; 1,2,3,7,8,9 hexa CDF; 2,3,4,6,7,8 hexa CDF; total hexa CDF; 1,2,3,4,6,7,8 hepta CDF; 1,2,3,4,7,8,9 hepta CDF; total hepta CDF; total octa CDF. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
88. The facility may elect to alternate Dioxin/Furan testing on each stack, if the previous two years indicate Dioxin/Furan emissions levels are less than or equal to 15 ng/dscm total mass, corrected to 12% CO₂. [40 CFR 60.38b and District Rule 4102] Federally Enforceable Through Title V Permit
89. Performance tests of both combustion unit exhausts shall be performed for HCl, corrected to 12% CO₂ on a dry basis, and for the following heavy metals, corrected to 12% CO₂ on a dry basis: Antimony, Arsenic, Beryllium, Cadmium, Total Chromium (5% of the total chromium shall be considered to be hexavalent chromium), Copper, Lead, Manganese, Mercury, Nickel, Selenium, Vanadium, and Zinc. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
90. A performance test of both combustion unit exhausts shall be performed for HF, corrected to 12% CO₂ on a dry basis. [District Rule 4102]
91. Cooling tower drift shall not exceed 0.005 percent of the circulating water flow or a maximum annual drift emission rate of 1,090,000 kg/year as demonstrated by design calculations. Chromium compounds shall not be used as an additive in the cooling tower water. [District Rule 4102]
92. Soot blowers or super heater rappers shall be operated in a mode consistent with normal cleaning requirements of the system during the performance tests. [District Rule 1081, 4.0] Federally Enforceable Through Title V Permit
93. The facility shall submit an annual report in accordance with 40 CFR 60.59b(g) by February 1 of each year following the calendar year in which the data were collected. [40 CFR 60.39b] Federally Enforceable Through Title V Permit
94. The facility shall submit semiannual reports within 31 days following the end of each 6 month period in accordance with 40 CFR 60.59b(h). [40 CFR 60.39b] Federally Enforceable Through Title V Permit
95. A monthly report summarizing the quantity of pollutant emissions of SO₂, NO_x, and CO, based on data from the CEM system, shall be included in the information required by following condition. Copies of the monthly reports prepared pursuant to this condition shall be sent to the district office by the 15th day of the following month. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
96. Permittee shall maintain a complete file containing all measurements, records, required monitoring data and support information. Support information includes copies of all reports required by this permit and for continuous monitoring instrumentation, and all calibration and maintenance records. This file shall include, but not be limited to: (a) Data collected from in-stack monitoring instruments; (b) Input rate records for all fuels burned; (c) Purchase records that indicate the sulfur content, by weight, of all fuel oil #2 purchased; (d) Results of all source tests; (e) All other air pollution system performance evaluations and records of calibration checks, calibration gas cylinder changes, adjustments and maintenance performed on all equipment (including CEM adjustment or maintenance). [District Rule 1070, 4.0 & PSD SJ 86-03] Federally Enforceable Through Title V Permit
97. Records shall be kept for each unit with the following: (a) Specific time of operation of each combustion unit; (b) Specific time of operation of the auxiliary burners; (c) Equipment breakdowns or malfunctions; (d) Exceedances of emission standards. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit

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98. The permittee shall follow all written maintenance procedures and schedules for the following: all emissions control equipment, combustion units, and monitoring equipment for measuring emission levels. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
99. Operating and maintenance manuals, subject to District review, shall be provided for the equipment covered by this permit. The permittee's operators shall be trained in the operation and maintenance of both fuel burning and pollution control equipment. [District Rule 1070, 4.0] Federally Enforceable Through Title V Permit
100. If the Fuel Oil #2 is Air Resources Board regulated diesel fuel, with a supplier certified sulfur content less than 0.25% by weight, the operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
101. If the Fuel Oil #2 is non-certified for sulfur content of less than 0.25% by weight, then the owner or operator shall determine the sulfur content of each delivery of Fuel Oil being fired. The sulfur content shall be determined using ASTM method D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
102. Permittee shall provide access to all sampling ports and platforms on boiler exhaust stacks in accordance with 40 CFR 60.8(e) and District Rule 1081 (as amended 12/16/93). [District Rule 1081, 3.3; & PSD SJ 86-03] Federally Enforceable Through Title V Permit
103. The SO₂ emissions from both combustion units shall be more stringent of 35.6 lb/hr or 42 ppm, dry, corrected to 12% CO₂, averaged over three hour period and more stringent of 33.3 lb/hr or 40 ppm, dry, corrected to 12% CO₂, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
104. The NO_x emissions from both combustion units shall be more stringent of 107 lb/hr or 175 ppm, dry, corrected to 12% CO₂, averaged over three hour period and more stringent of 100 lb/hr or 165 ppm, dry, corrected to 12% CO₂, averaged over a 24 hour period. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
105. The CO emissions from both combustion units shall be 33.3 lb/hr or 400 ppm, dry, corrected to 12% CO₂ (3-hour average). [PSD SJ 86-03] Federally Enforceable Through Title V Permit
106. The Mercury emissions from both combustion units shall not exceed 0.083 lb/hr (3-hour average) as measured by EPA Method 101. Upon EPA approval of a change to the facility PSD permit allowing Method 29 to be used in place of Method 101, Method 29 may be used to measure Mercury emissions. (40 CFR Part 61, Appendix B). [PSD SJ 86-03] Federally Enforceable Through Title V Permit
107. Permittee shall submit a written report of all excess emissions to EPA (Attn: A-3-3) for every calendar quarter. The report shall include the following: (a) the magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions. (b) Specific identification of each time period of excess emissions that occurs during startups, shutdowns, and malfunctions of furnace/boiler system. The nature and cause of malfunction (if known) and corrective action taken or preventive measures adopted shall be reported. (c) The date and time identifying each period during which continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs and adjustments. (d) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in report. (e) Excess emissions shall be defined as any three-hour period during which the average emissions of NO_x, SO₂, and/or CO, as measured by continuous monitoring system exceeds the NO_x, SO₂, and/or CO emission limit set for each of the pollutants. (f) Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limit for purposes of PSD permit. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
108. The calculation of annual emissions shall commence with the submission of the first fourth-quarter report, and will continue to be calculated and submitted with each successive quarterly report. The quarterly reports shall contain highest annual emissions computed for each week in the quarter, as well as all excesses of the annual emissions limits. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
109. Permittee shall meet all applicable requirements of Subparts A, Db, and E of 40 CFR 60. [PSD SJ 86-03] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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110. Permittee shall comply with following activated carbon mass feed requirements: (1) During the initial performance test and each subsequent performance test for dioxins/furans and mercury, as applicable, the permittee shall calculate and record an average carbon mass feed rate in pounds per hour being employed based on load cell measurements of carbon feed during the test; (2) During operation of the facility, the carbon injection mass feed rate must be measured using load cells, calculated and recorded on an eight (8) hour block average basis, and must equal or exceed the level(s) documented during the most recent performance tests for dioxins/furans and mercury. When calculating the eight (8) hour block average, exclude the hours when the combustion unit is not operational and include the hours when the combustion unit is operating but the carbon feed system is not working properly. [40 CFR 60.38b & 40 CFR 60.58b(m)(1), (2)] Federally Enforceable Through Title V Permit
111. The permittee shall estimate the total carbon usage of the plant (kilograms or pounds) for each calendar quarter by two independent methods, according to the following procedures: (1) The weight of carbon delivered to the plant. (2) The permittee shall estimate the average carbon mass feed rate for each during the operation of each combustion unit, and sum the results for both units at the plant for the total number of hours of operation during the calendar quarter. [40 CFR 60.38b & 40 CFR 60.58b(m)] Federally Enforceable Through Title V Permit
112. Should additional guidance related to the June 3, 1986 PSD remand, applicable to PSD permit action, be developed, the Permittee shall provide to EPA any such analysis, data, or demonstration of compliance with the other requirements within the time required by the guidance. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
113. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Section VIII of these conditions. In addition, the Regional Administrator shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Section IX of these conditions, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of this permit or of any law or regulations which such malfunction may cause. [PSD SJ 86-03] Federally Enforceable Through Title V Permit
114. Facility shall operate only when a fully certified chief facility operator or fully certified shift supervisor is on duty, except as allowed under 40 CFR 60.54b(c)(2). [40 CFR 60.35b] Federally Enforceable Through Title V Permit
115. All chief facility operators, shift supervisors, and control room operators shall have completed the EPA or State municipal waste combustor operator training course. [40 CFR 60.35b] Federally Enforceable Through Title V Permit
116. Owner or operator shall conduct a performance test for opacity on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test, and must complete five performance tests in each 5-year calendar period) using EPA Method 9 and the average of three test runs to determine compliance. [40 CFR 60.38b] Federally Enforceable Through Title V Permit
117. Permittee shall establish parameters for the differential pressure across the baghouse filter, which provides a reasonable assurance of ongoing compliance with emission limitations stated in this permit. The initial parameters shall be established using manufacturer/supplier recommendations and by correlating with opacity readings and source test results. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
118. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
119. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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120. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
121. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9 [40 CFR Part 64] Federally Enforceable Through Title V Permit
122. During any 96-hour periods of startup or 12-hour periods of shutdown, the facility shall be exempt from emission limits identified in this permit which are based upon District Rule 4352. [District Rule 4352] Federally Enforceable Through Title V Permit
123. Upon detecting any excursion from the 10% opacity limit, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
124. The baghouse shall operate at all times with a minimum differential pressure of 2 inches water column and a maximum differential pressure of 10 inches water column [40 CFR Part 64] Federally Enforceable Through Title V Permit
125. The baghouse differential operating pressure shall be monitored and recorded on each day the solid waste combustors/boilers operate. The permittee shall compare the readings with the acceptable range. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR Part 64] Federally Enforceable Through Title V Permit
126. Each time SO₂ emissions from each combustion unit exceeds 30 ppmv, dry, corrected to 12% CO₂, based on an eight-hour rolling average, facility shall demonstrate that SO₂ removal efficiency is at least 80% as measured by EPA Methods 1-4 and 6C, based on the measurement of the inlet and outlet SO₂ concentrations. [40 CFR Part 64] Federally Enforceable Through Title V Permit
127. A permit shield is granted from 40 CFR 60 Subpart Db (2/27/14) requirements for these units because the combustors are exempt from the requirements of Subpart Db since the facility meets the applicability requirements and is subject to an EPA approved State Section 111(d)/129 plan implementing 40 CFR 60 Subpart Db. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
128. A permit shield is granted from 40 CFR 60 Subpart Dc requirements for these units because the units are rated greater than 100 MMBtu/hr and thus don't meet the applicability criteria of Subpart Dc. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
129. A permit shield is granted from District Rule 4305 (8/21/03) requirements since section 4.1.1 of this rule exempts solid fuel fired units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
130. A permit shield is granted from District Rule 4351 (8/21/03) requirements since section 4.1.2 of this rule exempts solid fuel fired units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
131. Compliance with the permit conditions in this permit shall be deemed compliance with the requirements of District Rule 4352 (12/15/11). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
132. A permit shield is granted from District Rule 4802 (12/17/92) requirements since the combustors do not meet the definition of sulfuric acid production units. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
133. A permit shield is granted from District Rule 7012 (12/17/92) requirements since the use of cooling water additives containing hexavalent chromium is prohibited. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2073-4-1

EXPIRATION DATE: 10/31/2021

EQUIPMENT DESCRIPTION:

175 BHP CLARKE/JOHN DEERE MODEL JU6H-UFADMG TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE
POWERING A FIRE PUMP

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed any of the following limits: 2.5 g-NOx/bhp-hr, 1.0 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed 0.09 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
8. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
9. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rules 4102, 4701, and 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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10. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4701 and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
11. The permittee shall maintain monthly records of the type of fuel purchased. [District Rules 4701 and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701 and 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
13. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the requirements of District Rule 4701 (8/21/03). A permit shield has been granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
14. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the requirements of District Rule 4702 (11/14/13). A permit shield has been granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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