



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



FEB 26 2020

Mr. John Archibald
MRP San Joaquin Energy, LLC
14950 W Schulte Rd
Tracy, CA 95377

Re: Notice of Final Action - Title V Permit Renewal
Facility Number: N-4597
Project Number: N-1183007

Dear Mr. Archibald:

The District has issued the Final Renewed Title V Permit for MRP San Joaquin Energy, LLC (see enclosure). The preliminary decision for this project was made on January 8, 2020. 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 posted on the District's website (www.valleyair.org).

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via EPS

Samir Sheikh

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



Permit to Operate

FACILITY: N-4597

EXPIRATION DATE: 06/30/2024

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

MRP SAN JOAQUIN ENERGY, LLC
14950 W SCHULTE RD
TRACY COMBINED CYCLE POWER PLANT
TRACY, CA 95377

FACILITY LOCATION:

14950 W SCHULTE RD
TRACY COMBINED CYCLE POWER PLANT
TRACY, CA 95377

FACILITY DESCRIPTION:

ELECTRIC POWER GENERATION

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.

Samir Sheikh
Executive Director / APCO

Arnaud Marjollet
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: N-4597-0-4

EXPIRATION DATE: 06/30/2024

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; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: MRP SAN JOAQUIN ENERGY, LLC
Location: 14950 W SCHULTE RD, TRACY COMBINED CYCLE POWER PLANT, TRACY, CA 95377
N-4597-0-4 : Feb 25 2020 1:14PM -- BRARG

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All equipment shall be maintained in proper operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
44. The permittee shall maintain records of the cumulative annual facility-wide NO_x, VOC, and PM₁₀ emissions. The records shall be updated daily. [District Rule 2201] Federally Enforceable Through Title V Permit
45. Should the facility, as defined in 40 CFR 68.3, become subject to part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR Part 70. [40 CFR Part 68, Subpart G] 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-4597-1-9

EXPIRATION DATE: 06/30/2024

EQUIPMENT DESCRIPTION:

88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #1 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-2)

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. Owner/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] Federally Enforceable Through Title V Permit
3. 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] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
6. Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater, except for up to three minutes in any hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
7. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve this gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During all types of operation, including startup and shutdown periods, ammonia injection in to the SCR system shall occur once a minimum catalyst face temperature of 435 degrees Fahrenheit has been reached. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201 and 40 CFR 60.4330(a)(2)] 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.

11. Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NO_x (as NO₂) - 8.10 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 3.90 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 1.13 lb/hr and 1.5 ppmvd @ 15% O₂; PM₁₀ - 4.40 lb/hr; or SO_x (as SO₂) - 2.03 lb/hr. NO_x (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
12. Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NO_x (as NO₂) - 10.30 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 6.00 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 3.22 lb/hr and 2.0 ppmvd @ 15% O₂; PM₁₀ - 5.80 lb/hr; or SO_x (as SO₂) - 2.63 lb/hr. NO_x (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
13. During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NO_x (as NO₂) - 390.5 lb/event; CO - 562.5 lb/event; VOC (as methane) - 10.5 lb/event; PM₁₀ - 11.0 lb/event; or SO_x (as SO₂) - 4.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
14. During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NO_x (as NO₂) - 104.0 lb/event; CO - 148.0 lb/event; VOC (as methane) - 2.6 lb/event; PM₁₀ - 3.0 lb/event; or SO_x (as SO₂) - 1.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
15. A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the steady state lb/hr and ppmvd emission limits of this permit. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
16. The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
17. The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 2201 and 40 CFR 60.4333(a)] Federally Enforceable Through Title V Permit
19. The ammonia (NH₃) emissions shall not exceed 5 ppmvd @ 15% O₂ or 9.40 lb/hr over a 24 hour rolling average. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: $(\text{ppmvd @ 15\% O}_2) = ((a - (b \times c / 1,000,000)) \times (1,000,000 / b)) \times d$, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NO_x concentration ppmvd @ 15% O₂ across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; or 2.) Utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O₂. If this option is chosen, the owner/operator shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Daily emissions from the CTG shall not exceed the following limits: NO_x (as NO₂) - 814.9 lb/day; CO - 1071.6 lb/day; VOC - 78.6 lb/day; PM₁₀ - 132.0 lb/day; or SO_x (as SO₂) - 58.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NO_x (as NO₂) - 88,881 lb/year; CO - 74,598 lb/year; VOC - 15,145 lb/year; PM₁₀ - 32,250 lb/year; or SO_x (as SO₂) - 7,084 lb/year. Compliance with the annual NO_x and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM₁₀ and SO_x emission limits shall be demonstrated using the most recent source test results. [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.

23. Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The combined natural gas fuel usage for permit units N-4597-1 and N-4597-2 shall not exceed 20,454 MMscf/year. [District Rule 2550] Federally Enforceable Through Title V Permit
26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to measure the steady state NO_x, CO, VOC, and NH₃ emission rates (lb/hr and ppmvd @ 15% O₂) shall be conducted at least once every 12 months. [District Rules 1081, 2201 and 4703, and 40 CFR 60.4340, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
28. Source testing to measure the PM₁₀ emission rate (lb/hr) shall be conducted at least once every twelve months. [District Rules 1081 and 2201, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
29. Source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) at least once every seven years. CEM relative accuracy for NO_x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing shall be conducted every 12 months. If an annual startup and shutdown NO_x and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NO_x and CO testing frequency shall return to the once every seven years schedule. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
30. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [District Rule 4703] Federally Enforceable Through Title V Permit
31. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following test methods shall be used: NO_x - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM₁₀ - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O₂ - EPA Method 3, 3A, or 20 or ARB 100. NO_x testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703, and 40 CFR 60.4400(1)(i) and 40 CFR 60.4400(a)(2), (3), and (b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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33. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201, and 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit
34. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months / total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
35. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4360 and 40 CFR 60.4415(a)(1)(ii)] Federally Enforceable Through Title V Permit
36. The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
37. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x, CO and O₂ concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080 and 4703, and 40 CFR 60.4335(b)(1)] Federally Enforceable Through Title V Permit
38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
39. The NO_x, CO and O₂ CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4, and/or 40 CFR 75 Appendix A, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
41. The owner/operator shall perform a relative accuracy test audit (RATA) for NO_x, CO and O₂ as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. [District Rule 1080] Federally Enforceable Through Title V Permit
42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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43. Results of the CEM system shall be averaged over a one hour period for NOx emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [District Rule 4703, and 40 CFR 60.13 and 40 CFR 60.4350(a)] Federally Enforceable Through Title V Permit
44. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit
45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
46. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
47. Excess NOx emissions shall be defined as any 30 day operating period in which the 30 day rolling average NOx concentration exceeds an applicable emissions limit. A 30 day rolling average NOx emission rate is the arithmetic average of all hourly NOx emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NOx emission rates for the preceding 30 unit operating days if a valid NOx emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.4350(h) and 40 CFR 60.4380(b)(1)] Federally Enforceable Through Title V Permit
48. For the purpose of determining excess NOx emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NOx emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O2 concentration exceeds 19.0 percent O2, a diluent cap value of 19 percent O2 may be used in the emission calculations. [40 CFR 60.4350(b)] Federally Enforceable Through Title V Permit
49. Excess SOx emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SOx begins when a sample is not taken by its due date. A period of monitor downtime for SOx also begins on the date and hour of a required sample, if invalid results are obtained. A period of SOx monitoring downtime ends on the date and hour of the next valid sample. [40 CFR 60.4385(a) and (c)] Federally Enforceable Through Title V Permit
50. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080, and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit
51. The owner/operator shall submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit during times that the CEMS is not functioning properly. [District Rule 4703] Federally Enforceable Through Title V Permit
52. The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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53. The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
54. The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit
55. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
56. This unit shall be equipped with temperature measurement devices that continuously measure both the hot and cold oxidation catalyst temperatures. [40 CFR 64] Federally Enforceable Through Title V Permit
57. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured hot oxidation catalyst temperature shall be equal to or greater than 950 degrees Fahrenheit and shall be less than or equal to 1100 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
58. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured cold oxidation catalyst temperature shall be equal to or greater than 450 degrees Fahrenheit and shall be less than or equal to 700 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
59. Upon detecting any excursion from the acceptable hot and/or cold oxidation catalyst temperature ranges, the owner/operator shall investigate the excursion and take corrective action to minimize excessive emissions and prevent the recurrence of the excursion as expeditiously as possible. [40 CFR 64] Federally Enforceable Through Title V Permit
60. The owner/operator shall keep records of the hot and cold oxidation catalyst temperatures and any maintenance/repairs performed on the temperature monitoring system. [40 CFR 64] Federally Enforceable Through Title V Permit
61. 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
62. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
63. 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 part 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
64. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit
65. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
67. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-2-9

EXPIRATION DATE: 06/30/2024

EQUIPMENT DESCRIPTION:

88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #2 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-1)

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. Owner/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] Federally Enforceable Through Title V Permit
3. 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] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
6. Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater, except for up to three minutes in any hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
7. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve this gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During all types of operation, including startup and shutdown periods, ammonia injection in to the SCR system shall occur once a minimum catalyst face temperature of 435 degrees Fahrenheit has been reached. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201 and 40 CFR 60.4330(a)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO₂) - 8.10 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 3.90 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 1.13 lb/hr and 1.5 ppmvd @ 15% O₂; PM₁₀ - 4.40 lb/hr; or SO_x (as SO₂) - 2.03 lb/hr. NOX (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
12. Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO₂) - 10.30 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 6.00 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 3.22 lb/hr and 2.0 ppmvd @ 15% O₂; PM₁₀ - 5.80 lb/hr; or SO_x (as SO₂) - 2.63 lb/hr. NOX (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
13. During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NO_x (as NO₂) - 390.5 lb/event; CO - 562.5 lb/event; VOC (as methane) - 10.5 lb/event; PM₁₀ - 11.0 lb/event; or SO_x (as SO₂) - 4.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
14. During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NO_x (as NO₂) - 104.0 lb/event; CO - 148.0 lb/event; VOC (as methane) - 2.6 lb/event; PM₁₀ - 3.0 lb/event; or SO_x (as SO₂) - 1.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
15. A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the steady state lb/hr and ppmvd emission limits of this permit. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
16. The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
17. The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 2201 and 40 CFR 60.4333(a)] Federally Enforceable Through Title V Permit
19. The ammonia (NH₃) emissions shall not exceed 5 ppmvd @ 15% O₂ or 9.40 lb/hr over a 24 hour rolling average. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: $(\text{ppmvd @ 15\% O}_2) = ((a - (b \times c / 1,000,000)) \times (1,000,000 / b)) \times d$, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NO_x concentration ppmvd @ 15% O₂ across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; or 2.) Utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O₂. If this option is chosen, the owner/operator shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Daily emissions from the CTG shall not exceed the following limits: NO_x (as NO₂) - 814.9 lb/day; CO - 1071.6 lb/day; VOC - 78.6 lb/day; PM₁₀ - 132.0 lb/day; or SO_x (as SO₂) - 58.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NO_x (as NO₂) - 88,881 lb/year; CO - 74,598 lb/year; VOC - 15,145 lb/year; PM₁₀ - 32,250 lb/year; or SO_x (as SO₂) - 7,084 lb/year. Compliance with the annual NO_x and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM₁₀ and SO_x emission limits shall be demonstrated using the most recent source test results. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The combined natural gas fuel usage for permit units N-4597-1 and N-4597-2 shall not exceed 20,454 MMscf/year. [District Rule 2550] Federally Enforceable Through Title V Permit
26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to measure the steady state NO_x, CO, VOC, and NH₃ emission rates (lb/hr and ppmvd @ 15% O₂) shall be conducted at least once every twelve months. [District Rules 1081, 2201 and 4703, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
28. Source testing to measure the PM₁₀ emission rate (lb/hr) shall be conducted at least once every twelve months. [District Rules 1081 and 2201, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
29. Source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) at least once every seven years. CEM relative accuracy for NO_x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing shall be conducted every 12 months. If an annual startup and shutdown NO_x and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NO_x and CO testing frequency shall return to the once every seven years schedule. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
30. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [District Rule 4703] Federally Enforceable Through Title V Permit
31. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following test methods shall be used: NO_x - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM₁₀ - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O₂ - EPA Method 3, 3A, or 20 or ARB 100. NO_x testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703, and 40 CFR 60.4400(1)(i) and 40 CFR 60.4400(a)(2), (3), and (b)] Federally Enforceable Through Title V Permit

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

33. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201, and 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit
34. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months / total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
35. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4360 and 40 CFR 60.4415(a)(1)(ii)] Federally Enforceable Through Title V Permit
36. The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
37. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x, CO and O₂ concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080 and 4703, and 40 CFR 60.4335(b)(1)] Federally Enforceable Through Title V Permit
38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
39. The NO_x, CO and O₂ CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4, and/or 40 CFR 75 Appendix A, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
41. The owner/operator shall perform a relative accuracy test audit (RATA) for NO_x, CO and O₂ as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. [District Rule 1080] Federally Enforceable Through Title V Permit
42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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43. Results of the CEM system shall be averaged over a one hour period for NOx emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [District Rule 4703, and 40 CFR 60.13 and 40 CFR 60.4350(a)] Federally Enforceable Through Title V Permit
44. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit
45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
46. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
47. Excess NOx emissions shall be defined as any 30 day operating period in which the 30 day rolling average NOx concentration exceeds an applicable emissions limit. A 30 day rolling average NOx emission rate is the arithmetic average of all hourly NOx emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NOx emission rates for the preceding 30 unit operating days if a valid NOx emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.4350(h) and 40 CFR 60.4380(b)(1)] Federally Enforceable Through Title V Permit
48. For the purpose of determining excess NOx emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NOx emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O2 concentration exceeds 19.0 percent O2, a diluent cap value of 19 percent O2 may be used in the emission calculations. [40 CFR 60.4350(b)] Federally Enforceable Through Title V Permit
49. Excess SOx emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SOx begins when a sample is not taken by its due date. A period of monitor downtime for SOx also begins on the date and hour of a required sample, if invalid results are obtained. A period of SOx monitoring downtime ends on the date and hour of the next valid sample. [40 CFR 60.4385(a) and (c)] Federally Enforceable Through Title V Permit
50. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080, and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit
51. The owner/operator shall submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit during times that the CEMS is not functioning properly. [District Rule 4703] Federally Enforceable Through Title V Permit
52. The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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53. The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
54. The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit
55. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
56. This unit shall be equipped with temperature measurement devices that continuously measure both the hot and cold oxidation catalyst temperatures. [40 CFR 64] Federally Enforceable Through Title V Permit
57. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured hot oxidation catalyst temperature shall be equal to or greater than 950 degrees Fahrenheit and shall be less than or equal to 1100 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
58. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured cold oxidation catalyst temperature shall be equal to or greater than 450 degrees Fahrenheit and shall be less than or equal to 700 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
59. Upon detecting any excursion from the acceptable hot and/or cold oxidation catalyst temperature ranges, the owner/operator shall investigate the excursion and take corrective action to minimize excessive emissions and prevent the recurrence of the excursion as expeditiously as possible. [40 CFR 64] Federally Enforceable Through Title V Permit
60. The owner/operator shall keep records of the hot and cold oxidation catalyst temperatures and any maintenance/repairs performed on the temperature monitoring system. [40 CFR 64] Federally Enforceable Through Title V Permit
61. 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
62. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
63. 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 part 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
64. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit
65. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
67. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-4-5

EXPIRATION DATE: 06/30/2024

EQUIPMENT DESCRIPTION:

471 HP CATERPILLAR MODEL 3456 DI TA AA DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A 300 KW ELECTRICAL GENERATOR

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 engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. 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
4. This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. 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]
6. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
7. NOx emissions shall not exceed 4.69 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CO emissions shall not exceed 0.12 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions shall not exceed 0.04 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 0.029 g/bhp-hr based on U.S EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
11. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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14. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
19. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
21. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
22. The permittee must collect and submit an annual report including location, dates and times of operation if the engine operates for more than 15 hours and up to 100 hours per year for emergency demand response. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
23. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-5-2

EXPIRATION DATE: 06/30/2024

EQUIPMENT DESCRIPTION:

39 MMBTU/HR NATURAL GAS-FIRED ENGLISH BOILER AND TUBE INC MODEL 28D375 BOILER (S/N 31015) WITH AN ULTRA-LOW-NOX BURNER AND FLUE GAS RECIRCULATION

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. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The flue gas recirculation (FGR) system shall be operated properly and shall be maintained per the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. The fuel meter shall be calibrated per the fuel meter manufacturer's recommendations. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
5. The boiler shall operate a maximum of 4,000 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The boiler shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 6 .0 ppmvd @ 3% O₂ or 0.0073 lb/MMBtu; VOC (as methane) - 0.005 lb/MMBtu; CO - 50.0 ppmvd @ 3% O₂ or 0.037 lb/MMBtu; PM₁₀ - 0.007 lb/MMBtu; or SO_x (as SO₂) - 0.0019 lb/MMBtu. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
8. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute (or longer periods as necessary) test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months divided by the total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
21. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processors Association Standard 2377. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The minimum flue gas recirculation rate shall be established by source testing the unit per Rules 4305, 4306, and 4320 at three firing rates (low, mid, and high). The normal range shall be no lower than the minimum flue gas recirculation rate that complies with the NOx and CO emission limits as demonstrated through source testing at a similar fire rate. The source test emission measurements shall be made with the unit operating at conditions representative of normal operations. No measurements shall be made within the first two hours after a continuous period in which fuel flow to the unit is shut off 30 minutes or longer, or within 30 minutes after a re-ignition as defined in District Rule 4306. A flow transmitter shall be calibrated prior to the source test. [District Rules 4305, 4306, and 4320] 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 normal flue gas recirculation rate or level shall be re-established during each source test required by the permit. The flow transmitter shall be calibrated prior to each source test. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Permittee shall continuously monitor and record the flue gas recirculation rate using a flow transmitter and the plant's CEM DAHS during period when this boiler is in use. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. If the flue gas recirculation rate is less than the normal range during periods of normal operation, permittee shall return the flue gas recirculation rate to the normal range as soon as possible, but no later than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range or level within 1 hour of operation after detection, permittee shall notify the District within the following 1 hour and shall conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the auxiliary boiler emission limits at the new flue gas recirculation rate. A district-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, permittee may stipulate that a violation has occurred and may be subject to enforcement action. Permittee shall correct the violation, demonstrate compliance has been re-established, and resume monitoring. If the deviations are the result of a qualifying breakdown condition pursuant to District Rule 1100, permittee may fully comply with District Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. Permittee shall keep records of the normal flue gas recirculation rate range established during source testing, the date and time of flue gas recirculation rate monitoring, and the measured flue gas recirculation rate and the firing rate at the time of the monitoring event. The records shall include a description of any corrective action taken to maintain the flue gas recirculation rate within the normal range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Owner/operator shall maintain daily records of the type and quantity of fuel combusted by the boiler. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
29. Owner/operator shall keep a record of the cumulative annual quantity of hours operated for this unit. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] 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-4597-6-2

EXPIRATION DATE: 06/30/2024

EQUIPMENT DESCRIPTION:

235 BHP CUMMINS MODEL CFP7E-50 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER 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, 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 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
4. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 2.475 g-NOx/bhp-hr, 1.193 g-CO/bhp-hr, or 0.062 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed 0.111 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
8. 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 Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
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, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII] 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

Title V Permit Renewal Evaluation MRP San Joaquin Energy, LLC N-4597

TABLE OF CONTENTS

I.	PROPOSAL	2
II.	FACILITY LOCATION	2
III.	EQUIPMENT LISTING	2
IV.	GENERAL PERMIT TEMPLATE USAGE	3
V.	SCOPE OF EPA AND PUBLIC REVIEW	3
VI.	FEDERALLY ENFORCEABLE REQUIREMENTS	3
VII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE	8
VIII.	PERMIT REQUIREMENTS	9
IX.	PERMIT SHIELD	20
X.	CALIFORNIA ENVIRONMENTAL QUALITY ACT	20
XI.	PERMIT CONDITIONS	21

ATTACHMENTS

- A. RENEWED TITLE V OPERATING PERMIT
- B. PREVIOUS TITLE V OPERATING PERMIT
- C. EQUIPMENT LISTING
- D. DISTRICT'S RESPONSE TO FACILITY'S COMMENTS

TITLE V PERMIT RENEWAL EVALUATION

Combined-Cycle Power Plant

Engineer: Gurpreet Brar
Date: February 24, 2020

Facility ID: N-4597
Facility Name: MRP San Joaquin Energy, LLC
Mailing Address: 14950 W Schulte Rd
Tracy, CA 95377

Contact Name: John Archibald
Phone #: (209) 248-6838
Email: john.archibald@naes.com

Responsible Official: John Archibald
Title: Plant Manager

Project #: N-1183007
Deemed Complete: October 15, 2018

I. PROPOSAL

MRP San Joaquin Energy, LLC was issued their initial Title V permit in 2004. The permit was previously renewed in 2014. As required by District Rule 2520, the applicant has applied for a permit renewal. The existing Title V permit will be reviewed and modified to reflect all applicable District and federal rules that have been updated, removed, or added since the last renewal.

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

II. FACILITY LOCATION

MRP San Joaquin Energy, LLC is located at 14950 W Schulte Rd in Tracy, CA.

III. EQUIPMENT LISTING

A detailed facility report listing all the permitted equipment at this 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 general permit template SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

Template SJV-UM-0-3 conditions have been added as conditions 1 through 40 for the facility wide requirements (N-4597-0-4).

V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

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

Renewed Permit	Permit Conditions
N-4597-0-4	1 through 40

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

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

Rules Updated or Evaluated

- District Rule 2020, Exemptions
(amended August 18, 2011 ⇒ amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule
(amended April 21, 2011 ⇒ amended August 15, 2019)
- District Rule 2520, Federally Mandated Operating Permits
(amended June 21, 2001 ⇒ amended August 15, 2019)
- 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
(amended July 7, 2016)
- 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
(amended February 27, 2014)
- 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
(amended November 20, 2015)
- 40 CFR Part 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources
(amended September 14, 2016)
- 40 CFR Part 64, Compliance Assurance Monitoring
(adopted October 22, 1997)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners
(amended June 25, 2013)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reductions
(amended December 27, 2017)
- 40 CFR Part 68, Subpart G, Chemical Accident Prevention Provisions
(amended December 19, 2019)

Rules Removed

There have been no rules removed since the last renewed Title V permit was issued.

Rules Added

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

Rules Not Updated

- District Rule 1070, Inspections
(amended December 17, 1992)
- District Rule 1081, Source Sampling
(amended December 16, 1993)
- District Rule 1100, Equipment Breakdown (Non-SIP replacement for San Joaquin County Rule 110)
(amended December 17, 1992)
- District Rule 1160, Emission Statements
(amended November 18, 1992)
- District Rule 2010, Permits Required
(amended December 17, 1992)
- District Rule 2031, Transfer of Permits
(amended December 17, 1992)
- District Rule 2040, Applications
(amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications
(amended December 17, 1992)
- District Rule 2080, Conditional Approval
(amended December 17, 1992)
- District Rule 4101, Visible Emissions
(amended February 17, 2005)

- District Rule 4201, Particulate Matter Concentration
(amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate
(amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment
(amended December 17, 1992)
- District Rule 4304, Equipment Tuning Procedures for Boilers, Steam Generators, and Process Heaters
(amended October 19, 1995)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters - Phase 2
(amended August 21, 2003)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters - Phase 3
(amended October 16, 2008)
- District Rule 4320, Advanced Emissions Reduction Options For Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr
(adopted October 16, 2008)
- District Rule 4351, Boilers, Steam Generators, and Process Heaters - Phase 1 (amended August 21, 2003)
- District Rule 4601, Architectural Coatings
(amended December 17, 2009)
- District Rule 4701, Internal Combustion Engines – Phase 1
(amended August 21, 2003)
- District Rule 4702, Internal Combustion Engines
(amended November 14, 2013)
- District Rule 4801, Sulfur Compounds
(amended December 17, 1992)
- District Rule 8011, Fugitive Dust General Requirements
(amended August 19, 2004)

- District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Construction, Demolition, Excavation, and Extraction Activities
(amended August 19, 2004)
- District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Handling and Storage of Bulk Materials
(amended August 19, 2004)
- District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Carryout and Trackout
(amended August 19, 2004)
- District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Open Areas
(amended August 19, 2004)
- District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Paved and Unpaved Roads
(amended August 19, 2004)
- District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Unpaved Vehicle/Equipment Areas
(amended September 16, 2004)
- 40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
(amended February 16, 2012)
- 40 CFR Part 61, Subpart M, National Emissions Standards for Asbestos
(amended July 20, 2004)
- 40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines
(amended February 27, 2014)
- 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Gas Turbines
(amended March 20, 2009)
- 40 CFR Part 72, Subpart A, Acid Rain Program General Provisions
(amended March 28, 2011)
- 40 CFR Part 73, Sulfur Dioxide Allowance System
(amended April 28, 2006)

- 40 CFR Part 75, Continuous Emission Monitoring
(amended January 18, 2012)
- 40 CFR Part 77, Excess Emissions
(amended May 12, 2005)

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 permit. 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 rules are not federally enforceable:

A. Rules Updated

No rules were updated.

B. Rules Added

No rules were added.

C. Rules Not Updated

- District Rule 1100, Equipment Breakdown
(amended December 17, 1992)
- District Rule 1160, Emission Statements
(adopted November 18, 1992)
- District Rule 2040, Applications
(amended December 17, 1992)
- District Rule 4102, Nuisance
(amended December 17, 1992)
- Title 17 California Code of Regulations (CCR) Section 93115, Airborne Toxic Control Measure for Stationary Compression Ignition Engines
(adopted February 26, 2004)

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 last Title V permit renewal in 2015.

A. District Rule 1080 – Stack Monitoring

District Rule 1080 grants the APCO the authority to request the installation, use maintenance, and inspection of continuous monitoring equipment. This rule also specifies the performance standards for the equipment and administrative recordkeeping, reporting, and violation and equipment breakdown notification requirements.

This rule has not been amended since the previous Title V permit renewal and therefore will not be addressed in this evaluation. However condition 40 on current permits N-4597-1-8 and -2-8 will be revised under this project. This rule does not require any notification to the District prior to completion of the audits; therefore, the following corrected condition will be placed as condition 40 on renewed permits N-4597-1-9 and -2-9:

- Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. ~~The District shall be notified prior to completion of the audits.~~ Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080]

B. District Rule 2020 – Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions.

The amendments to this rule involved (1) revisions to the HAP source definition, (2) incorporating additional EPA approved fuel sulfur test methods; (3) adding a small producer exemption for heavy oil storage tanks; (4) and clarifying the existing portable equipment exemption from permits.

The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed in this evaluation.

The following condition on the draft facility-wide permit will ensure compliance with the requirements of this rule.

Renewed Permit	Permit Condition
N-4597-0-4	4

C. District Rule 2201– New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this Title V permit was last renewed. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit. The updated requirements of this rule are therefore not applicable at this time.

D. District Rule 2410 – Prevention of Significant Deterioration

District Rule 2410 was not addressed in the previous Title V permit renewal. The requirements of this rule are only triggered at the time the source undergoes a modification. This source has never been subject to this rule, and the requirements of this rule cannot be triggered by the renewal of a Title V permit, since permit renewal does not involve any construction or modification of the stationary source. Therefore, the requirements of this rule are not applicable at this time.

E. District Rule 2520 – Federally Mandated Operating Permits

District Rule 2520 has been amended since this Title V permit was last renewed. The rule was amended to enhance the public notice procedures for District actions that trigger public notification requirements under the existing provisions of the Rule by requiring electronic notification (enotice) in place of newspaper publication. The amendment was done to be consistent with the EPA action that requires electronic notification (e-notice) in place of newspaper publication for EPA actions and for actions performed by other permitting authorities implementing federal permitting rules. The amendments to this rule does not have any effect on current permit requirements and therefore will not be addressed in this evaluation. However, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

Greenhouse Gas Discussion

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

F. District Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/Hr

District Rule 4320 has been not been amended since this Title V permit was last renewed. Since the boiler is subject to the tune-up requirements of Section 6.3.1 of this rule, the permit will be corrected under this Title V Renewal to add the tune-up requirements that were inadvertently not placed on the permit.

Per Section 6.3.1, each unit subject to the requirements in Section 5.2 shall be source tested to determine compliance with the applicable emission limits at least once every 12 months, (no more than 30 days before or after the required annual source test date). The units that demonstrate compliance on two consecutive 12-month source tests may defer the following 12-month source test for up to 36 months (no more than 30 days before or after the required 36-month source test date). During the 36-month source testing interval, the operator shall tune the unit in accordance with the provisions of Section 5.5.1, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer to ensure compliance with the applicable emission limits specified in Section 5.2.

Per Section 5.5.1, the unit shall be tuned at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown.

The following conditions will be added as conditions 9 and 10 on the renewed permit N-4597-5-2 to ensure compliance with the tune-up requirements of this rule:

- During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4305, 4306, and 4320]
- If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320]

Continued compliance with the other applicable requirements of this Rule is expected.

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

This rule is subject to owners and operators of stationary compression ignition (CI) internal combustion engines as specified below:

1. Owners and operators of stationary CI ICE engines that commence construction after July 11, 2005 where the CI ICE are:
 - i. Manufactured after April 1, 2006, and are not fire pump engines, or
 - ii. Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.
2. Owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005 and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005.

N-4597-4-5:

The engine under permit unit N-4597-4 was installed in September 2003 and has not been modified or reconstructed since that time. Therefore, 40 CFR 60 Subpart IIII requirements do not apply to that engine.

N-4597-6-2:

The engine under permit unit N-4597-6 is a certified NFPA fire pumps (<30 liters/cylinder) that was manufactured after July 1, 2006 and installed after July 11, 2005; therefore, this engine powering a fire pump is subject to the requirements of 40 CFR 60 Subpart IIII.

§60.4205(c) requires that 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. Table 4 emission standards for fire pump engines (after 2009) with $175 \leq \text{maximum bhp} \leq 300$ are 3.0 g-NO_x+VOC/bhp-hr, and 0.15 g-PM₁₀/bhp-hr.

§60.4206 requires that owners and operators must operate and maintain stationary CI ICE according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.

§60.4207(a) requires that owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. The use of CARB certified diesel fuel containing no more than 0.0015% sulfur by weight satisfies this requirement.

§60.4209(a) requires that owners and operators of an emergency stationary CI ICE must install a non-resettable hour meter on the engine.

§60.4211(a) requires that owners and operators must operate and maintain the stationary CI ICE according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer.

Section 60.4211(f) limits operation of the emergency engines to 100 hours per year for maintenance and testing.

The following conditions on the draft renewed permit will ensure compliance with the requirements of this subpart.

Renewed Permit	Condition #s
N-4597-6-2	3 through 8, and 11

H. 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

This national emission standard for hazardous air pollutants (NESHAP) is intended to regulate emissions of HAP from stationary reciprocating IC engines. This facility was determined to be an Area Source of HAP emissions in the previous Title V Renewal. Subpart ZZZZ applies to an existing stationary IC engine, so unit N-4597-4 is subject to the requirements of this Subpart. However, 40 CFR Part 60, Subpart ZZZZ was not amended since the previous TV permit was issued; therefore, the following conditions on the draft renewed permit will ensure continued compliance with the requirements of this Subpart.

Renewed Permit	Condition #s
N-4597-4-5	4, 14, 16 through 22, and 24

Pursuant to 40 CFR 63.6590(c)(1), a new or reconstructed stationary reciprocating internal combustion engine (RICE) located at an area source must meet the requirements of 40 CFR 63 Subpart ZZZZ by complying with 40 CFR 60 Subpart IIII if the engine is a new compression-ignited. Engine under permit unit N-4597-6 is a new engine, as it was installed after June 12, 2006, and was determined to be in compliance with 40 CFR 60 Subpart IIII requirements. Therefore, it is not subject to the requirements of 40 CFR 63 Subpart ZZZZ. Conditions 3 through 8 on the current permit N-4597-6-1 will be corrected to remove the reference to 40 CFR 63 Subpart ZZZZ as the engine is in compliance with 40 CFR 60 Subpart IIII.

I. H. 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Gas Turbines

40 CFR Part 60 Subpart KKKK applies to all stationary gas turbines rated at greater than or equal to 10 MMBtu/hr that commence construction, modification, or reconstruction after February 18, 2005. The two gas turbines at this site under permit units N-4597-1 and N-4597-2, each have ratings much greater than 10 MMBtu/hr and were both modified after February 18, 2005. Therefore, Subpart KKKK is applicable to each of these gas turbines.

Subpart KKKK has not been amended since the issuance of previous Title V renewal. However, the facility has proposed to update condition 35 on current permits to include all the test methods available to determine the sulfur content of gaseous fuel. The permit requirement will be updated to add test method ASTM D5504 as allowed by the performance tests in Sections 60.4360 and 60.4415 of this Subpart.

Section 60.4360 of this Subpart requires the owner or operator to monitor the total sulfur content of the fuel being fired in the turbine, except as provided in § 60.4365. The sulfur content of the fuel must be determined using total sulfur methods described in § 60.4415. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than half the applicable limit, ASTM D4084, D4810, D5504, or D6228, or Gas Processors Association Standard 2377 (all of which are incorporated by reference, see § 60.17), which measure the major sulfur compounds, may be used.

Section 60.4415(a)(1)(ii) of this Subpart states that the SO₂ performance tests for gaseous fuels shall be conducted on an annual basis using ASTM D1072, or alternatively D3246, D4084, D4468, D4810, D6228, D6667, or Gas Processors Association Standard 2377 as the test methods.

The following revised condition will be listed as condition 35 on the renewed permits N-4597-1-9 and -2-9 to demonstrate compliance with the requirements of Subpart KKKK:

- Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4360 and 40 CFR 60.4415(a)(1)(ii)]

The following conditions on the draft renewed permits will ensure continued compliance with the requirements of this Subpart.

Renewed Permits	Condition #s
N-4597-1-9 and -2-9	10 to 12, 18, 27, 28, 32, 33, 35, 37, 43, and 47 to 50

J. 40 CFR 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

Section 63.7485 states that Subpart DDDDD is applicable to owners and operators of an industrial, commercial, or institutional boiler or process heater that is located at major sources of Hazardous Air Pollutant (HAP) emissions, except as specified in § 63.7491.

As stated under project N-1133732, MRP San Joaquin Energy, LLC is not a Major Source of HAP emissions and is an area source for HAP emissions. There is no change in HAP emissions from the facility since this project; therefore, the boiler in this facility is not subject to this subpart, and no further discussion is required.

K. 40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources

Section 63.1193 states that Subpart JJJJJJ is applicable to owners and operators of an industrial, commercial, or institutional boiler that is located at, or is part of, an area source of Hazardous Air Pollutant (HAP) emissions.

Section 63.11195(e) states that gas-fired boilers are not subject to the requirements of this Subpart. The boiler at this facility under permit unit N-4597-5 is fired only on PUC-quality natural gas; therefore, it is not subject to the requirements of this subpart, and no further discussion is required.

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

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

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

Pollutant	Major Source Threshold (lb/year)
NO _x	20,000
SO _x	140,000
PM ₁₀	140,000
CO	200,000
VOC	20,000

40 CFR Part 64 defines a control device as equipment, other than inherent process equipment, that is used to destroy or remove air pollutants prior to discharge to the atmosphere.

a. N-4597-1-9 and '2-9: Combined-Cycle Power Generating Systems #1 and #2

These permit units have emissions limits for NO_x, SO_x, PM₁₀, CO, and VOC. Each of the turbines is equipped with a selective catalytic reduction system for control of NO_x emissions, and with an oxidation catalyst for control of CO and VOC emissions. CAM can only potentially be triggered for these pollutants.

Pursuant to Section 64.2(b)(vi), emission limits or standards for which the permit specifies a continuous compliance determination method are exempt from CAM requirements. Each of the turbines is equipped with a Continuous Emission Monitoring system (CEMs) that measures NO_x and CO emissions. Therefore, the turbines are exempt from CAM requirements for NO_x and CO.

The only remaining pollutant is VOC. The facility has determined that CAM is triggered for VOC emissions by each of the turbines. Thus, CAM requirements are applicable for VOC emissions. The permit conditions 56 through 63 ensure compliance with the applicable CAM requirements.

b. N-4597-4-5: Diesel Fired IC Engine Powering an Electrical Generator

This permit unit has emissions limits for NO_x, SO_x, PM₁₀, CO, and VOC but it does not have add-on controls for these criteria pollutants. Therefore, it is not subject to CAM for NO_x, SO_x, PM₁₀, CO, and VOC.

c. N-4597-5-2: 39 MMBtu/hr Natural Gas-Fired Boiler

This permit has emission limits for NO_x, SO_x, PM₁₀, CO, and VOC. Since the unit is not equipped with add-on controls for SO_x, PM₁₀, CO, or VOC, it is not subject to CAM for these pollutants.

The unit is equipped with flue gas recirculation (FGR) which controls NO_x emissions; therefore, CAM could be triggered for NO_x. The pre-control (i.e. pre-FGR) PE for NO_x is estimated as follows:

- The emission factor for natural gas-fired low NO_x burner is 50 lb/10⁶ scf (AP-42, 1.4-5, July 1998).
- The emission factor for natural gas-fired low NO_x burner with FGR is 32 lb/10⁶ scf (AP-42, 1.4-5, July 1998)

Thus, the estimated NOx control efficiency (NOx CE) for flue gas recirculation is calculated as follows:

$$\text{NOx CE} = (50 \text{ lb}/10^6 \text{ scf} - 32 \text{ lb}/10^6 \text{ scf}) \div 50 \text{ lb}/10^6 \text{ scf} \times 100\% \\ \text{NOx CE} = 36\%$$

The 39 MMBtu/hr boiler utilizes an ultra-low NOx burner and flue gas recirculation to control NOx emissions. The boiler permit limits the controlled emission rate to 0.0073 lb-NOx/MMBtu and limits the hours of operation to 4,000 hours/year. The uncontrolled emission factors are calculated as follows:

$$\text{Uncontrolled EF} = 0.0073 \text{ lb-NOx/MMBtu} \div (1 - 0.36) \\ = 0.0114 \text{ lb-NOx/MMBtu}$$

The uncontrolled potential to emit (PE) for the boiler will be calculated using uncontrolled emission factor and the annual heat input for the boiler:

$$\text{Uncontrolled PE} = 39 \text{ MMBtu/hr} \times 4,000 \text{ hr/year} \times 0.0114 \text{ lb-NOx/MMBtu} \\ = 1,778 \text{ lb-NOx/year}$$

Since the uncontrolled NOx emission rate for the boiler is less than the major source threshold for NOx, 20,000 lb-NOx/year, CAM is not triggered for this unit.

d. **N-4597-6-2: Diesel Fired IC Engine Powering a Firewater Pump**

This permit unit has emissions limits for NOx, SOx, PM₁₀, CO, and VOC but it does not have add-on controls for these criteria pollutants. Therefore, it is not subject to CAM for NOx, SOx, PM₁₀, CO, and VOC.

M. 40 CFR Part 82 Subpart B – Servicing of Motor Vehicle Air Conditioners

The purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Clean Air Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances.

These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this subpart did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation. The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Renewed Permit	Condition #
N-4597-0-4	28

N. 40 CFR Part 82 Subpart F – Recycling and Emissions Reductions

The purpose of 40 CFR Part 82 Subpart F is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

These regulations apply to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

The amendments to this subpart did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation. The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Renewed Permit	Condition #
N-4597-0-4	27

O. 40 CFR Part 68 Subpart G – Chemical Accident Prevention Provisions

For the stationary sources that could be subject to the risk management plan requirements, or the owner or operator wants flexibility to preclude a permit reopening if the source becomes subject to section 112(r)(3) of the Clean Air Act, the following condition will be placed on the draft renewed permit as a mechanism to ensure compliance with the requirements of this subpart:

Renewed Permit	Condition #
N-4597-0-4	45

IX. PERMIT SHIELD

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

A. Requirements Addressed by Model General Permit Templates

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

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template are included as conditions 39 and 40 of the facility-wide requirements (N-4597-0-4).

B. Requirements not Addressed by Model General Permit Templates

This Title V permit renewal application does not include any proposals for new permit shields or modifications to any pre-existing permit shields. The proposed renewed Title V permit therefore does not include any new or modified permit shields.

X. CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

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

XI. PERMIT CONDITIONS

The renewed Title V operating permit is included as Attachment A.

ATTACHMENTS

- A. Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Equipment Listing
- D. District's Response to Facility's Comments

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-4597-0-4

EXPIRATION DATE: 06/30/2019

FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: MRP SAN JOAQUIN ENERGY, LLC

Location: 14950 W SCHULTE RD, TRACY COMBINED CYCLE POWER PLANT, TRACY, CA 95377

N-4597-0-4 : Feb 24 2020 11:12AM - BRARG

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

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

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

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All equipment shall be maintained in proper operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
44. The permittee shall maintain records of the cumulative annual facility-wide NO_x, VOC, and PM₁₀ emissions. The records shall be updated daily. [District Rule 2201] Federally Enforceable Through Title V Permit

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

45. Should the facility, as defined in 40 CFR 68.3, become subject to part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR Part 70. [40 CFR Part 68, Subpart G] 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-4597-1-9

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #1 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-2)

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. Owner/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] Federally Enforceable Through Title V Permit
3. 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] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
6. Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater, except for up to three minutes in any hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
7. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve this gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During all types of operation, including startup and shutdown periods, ammonia injection in to the SCR system shall occur once a minimum catalyst face temperature of 435 degrees Fahrenheit has been reached. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201 and 40 CFR 60.4330(a)(2)] 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.

11. Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NO_x (as NO₂) - 8.10 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 3.90 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 1.13 lb/hr and 1.5 ppmvd @ 15% O₂; PM₁₀ - 4.40 lb/hr; or SO_x (as SO₂) - 2.03 lb/hr. NO_x (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
12. Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NO_x (as NO₂) - 10.30 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 6.00 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 3.22 lb/hr and 2.0 ppmvd @ 15% O₂; PM₁₀ - 5.80 lb/hr; or SO_x (as SO₂) - 2.63 lb/hr. NO_x (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
13. During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NO_x (as NO₂) - 390.5 lb/event; CO - 562.5 lb/event; VOC (as methane) - 10.5 lb/event; PM₁₀ - 11.0 lb/event; or SO_x (as SO₂) - 4.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
14. During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NO_x (as NO₂) - 104.0 lb/event; CO - 148.0 lb/event; VOC (as methane) - 2.6 lb/event; PM₁₀ - 3.0 lb/event; or SO_x (as SO₂) - 1.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
15. A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the steady state lb/hr and ppmvd emission limits of this permit. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
16. The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
17. The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 2201 and 40 CFR 60.4333(a)] Federally Enforceable Through Title V Permit
19. The ammonia (NH₃) emissions shall not exceed 5 ppmvd @ 15% O₂ or 9.40 lb/hr over a 24 hour rolling average. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: $(\text{ppmvd @ 15\% O}_2) = ((a - (b \times c / 1,000,000)) \times (1,000,000 / b)) \times d$, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NO_x concentration ppmvd @ 15% O₂ across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; or 2.) Utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O₂. If this option is chosen, the owner/operator shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Daily emissions from the CTG shall not exceed the following limits: NO_x (as NO₂) - 814.9 lb/day; CO - 1071.6 lb/day; VOC - 78.6 lb/day; PM₁₀ - 132.0 lb/day; or SO_x (as SO₂) - 58.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NO_x (as NO₂) - 88,881 lb/year; CO - 74,598 lb/year; VOC - 15,145 lb/year; PM₁₀ - 32,250 lb/year; or SO_x (as SO₂) - 7,084 lb/year. Compliance with the annual NO_x and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM₁₀ and SO_x emission limits shall be demonstrated using the most recent source test results. [District Rule 2201] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The combined natural gas fuel usage for permit units N-4597-1 and N-4597-2 shall not exceed 20,454 MMscf/year. [District Rule 2550] Federally Enforceable Through Title V Permit
26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to measure the steady state NO_x, CO, VOC, and NH₃ emission rates (lb/hr and ppmvd @ 15% O₂) shall be conducted at least once every 12 months. [District Rules 1081, 2201 and 4703, and 40 CFR 60.4340, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
28. Source testing to measure the PM₁₀ emission rate (lb/hr) shall be conducted at least once every twelve months. [District Rules 1081 and 2201, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
29. Source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) at least once every seven years. CEM relative accuracy for NO_x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing shall be conducted every 12 months. If an annual startup and shutdown NO_x and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NO_x and CO testing frequency shall return to the once every seven years schedule. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
30. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [District Rule 4703] Federally Enforceable Through Title V Permit
31. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following test methods shall be used: NO_x - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM₁₀ - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O₂ - EPA Method 3, 3A, or 20 or ARB 100. NO_x testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703, and 40 CFR 60.4400(1)(i) and 40 CFR 60.4400(a)(2), (3), and (b)] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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33. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201, and 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit
34. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months / total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
35. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4360 and 40 CFR 60.4415(a)(1)(ii)] Federally Enforceable Through Title V Permit
36. The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
37. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x, CO and O₂ concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080 and 4703, and 40 CFR 60.4335(b)(1)] Federally Enforceable Through Title V Permit
38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
39. The NO_x, CO and O₂ CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4, and/or 40 CFR 75 Appendix A, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
41. The owner/operator shall perform a relative accuracy test audit (RATA) for NO_x, CO and O₂ as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. [District Rule 1080] Federally Enforceable Through Title V Permit
42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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43. Results of the CEM system shall be averaged over a one hour period for NO_x emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [District Rule 4703, and 40 CFR 60.13 and 40 CFR 60.4350(a)] Federally Enforceable Through Title V Permit
44. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit
45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
46. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
47. Excess NO_x emissions shall be defined as any 30 day operating period in which the 30 day rolling average NO_x concentration exceeds an applicable emissions limit. A 30 day rolling average NO_x emission rate is the arithmetic average of all hourly NO_x emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NO_x emission rates for the preceding 30 unit operating days if a valid NO_x emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NO_x or O₂ (or both). [40 CFR 60.4350(h) and 40 CFR 60.4380(b)(1)] Federally Enforceable Through Title V Permit
48. For the purpose of determining excess NO_x emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NO_x emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O₂ concentration exceeds 19.0 percent O₂, a diluent cap value of 19 percent O₂ may be used in the emission calculations. [40 CFR 60.4350(b)] Federally Enforceable Through Title V Permit
49. Excess SO_x emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SO_x begins when a sample is not taken by its due date. A period of monitor downtime for SO_x also begins on the date and hour of a required sample, if invalid results are obtained. A period of SO_x monitoring downtime ends on the date and hour of the next valid sample. [40 CFR 60.4385(a) and (c)] Federally Enforceable Through Title V Permit
50. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO_x emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080, and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit
51. The owner/operator shall submit to the District information correlating the NO_x control system operating parameters to the associated measured NO_x output. The information must be sufficient to allow the District to determine compliance with the NO_x emission limits of this permit during times that the CEMS is not functioning properly. [District Rule 4703] Federally Enforceable Through Title V Permit
52. The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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53. The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
54. The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit
55. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
56. This unit shall be equipped with temperature measurement devices that continuously measure both the hot and cold oxidation catalyst temperatures. [40 CFR 64] Federally Enforceable Through Title V Permit
57. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured hot oxidation catalyst temperature shall be equal to or greater than 950 degrees Fahrenheit and shall be less than or equal to 1100 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
58. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured cold oxidation catalyst temperature shall be equal to or greater than 450 degrees Fahrenheit and shall be less than or equal to 700 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
59. Upon detecting any excursion from the acceptable hot and/or cold oxidation catalyst temperature ranges, the owner/operator shall investigate the excursion and take corrective action to minimize excessive emissions and prevent the recurrence of the excursion as expeditiously as possible. [40 CFR 64] Federally Enforceable Through Title V Permit
60. The owner/operator shall keep records of the hot and cold oxidation catalyst temperatures and any maintenance/repairs performed on the temperature monitoring system. [40 CFR 64] Federally Enforceable Through Title V Permit
61. 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
62. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
63. 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 part 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
64. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit
65. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
67. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-2-9

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #2 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-1)

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. Owner/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] Federally Enforceable Through Title V Permit
3. 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] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
6. Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater, except for up to three minutes in any hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
7. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve this gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During all types of operation, including startup and shutdown periods, ammonia injection in to the SCR system shall occur once a minimum catalyst face temperature of 435 degrees Fahrenheit has been reached. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12 month rolling average basis. [District Rule 2201 and 40 CFR 60.4330(a)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO₂) - 8.10 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 3.90 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 1.13 lb/hr and 1.5 ppmvd @ 15% O₂; PM₁₀ - 4.40 lb/hr; or SO_x (as SO₂) - 2.03 lb/hr. NOX (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
12. Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO₂) - 10.30 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 6.00 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 3.22 lb/hr and 2.0 ppmvd @ 15% O₂; PM₁₀ - 5.80 lb/hr; or SO_x (as SO₂) - 2.63 lb/hr. NOX (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
13. During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NO_x (as NO₂) - 390.5 lb/event; CO - 562.5 lb/event; VOC (as methane) - 10.5 lb/event; PM₁₀ - 11.0 lb/event; or SO_x (as SO₂) - 4.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
14. During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NO_x (as NO₂) - 104.0 lb/event; CO - 148.0 lb/event; VOC (as methane) - 2.6 lb/event; PM₁₀ - 3.0 lb/event; or SO_x (as SO₂) - 1.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
15. A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the steady state lb/hr and ppmvd emission limits of this permit. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
16. The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
17. The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 2201 and 40 CFR 60.4333(a)] Federally Enforceable Through Title V Permit
19. The ammonia (NH₃) emissions shall not exceed 5 ppmvd @ 15% O₂ or 9.40 lb/hr over a 24 hour rolling average. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: $(\text{ppmvd @ 15\% O}_2) = ((a - (b \times c / 1,000,000)) \times (1,000,000 / b)) \times d$, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NO_x concentration ppmvd @ 15% O₂ across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; or 2.) Utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O₂. If this option is chosen, the owner/operator shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Daily emissions from the CTG shall not exceed the following limits: NO_x (as NO₂) - 814.9 lb/day; CO - 1071.6 lb/day; VOC - 78.6 lb/day; PM₁₀ - 132.0 lb/day; or SO_x (as SO₂) - 58.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NO_x (as NO₂) - 88,881 lb/year; CO - 74,598 lb/year; VOC - 15,145 lb/year; PM₁₀ - 32,250 lb/year; or SO_x (as SO₂) - 7,084 lb/year. Compliance with the annual NO_x and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM₁₀ and SO_x emission limits shall be demonstrated using the most recent source test results. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The combined natural gas fuel usage for permit units N-4597-1 and N-4597-2 shall not exceed 20,454 MMscf/year. [District Rule 2550] Federally Enforceable Through Title V Permit
26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to measure the steady state NO_x, CO, VOC, and NH₃ emission rates (lb/hr and ppmvd @ 15% O₂) shall be conducted at least once every twelve months. [District Rules 1081, 2201 and 4703, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
28. Source testing to measure the PM₁₀ emission rate (lb/hr) shall be conducted at least once every twelve months. [District Rules 1081 and 2201, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
29. Source testing to measure startup and shutdown NO_x, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) at least once every seven years. CEM relative accuracy for NO_x and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NO_x and CO startup emission limits, then startup and shutdown NO_x and CO testing shall be conducted every 12 months. If an annual startup and shutdown NO_x and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NO_x and CO testing frequency shall return to the once every seven years schedule. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
30. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [District Rule 4703] Federally Enforceable Through Title V Permit
31. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following test methods shall be used: NO_x - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM₁₀ - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O₂ - EPA Method 3, 3A, or 20 or ARB 100. NO_x testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703, and 40 CFR 60.4400(1)(i) and 40 CFR 60.4400(a)(2), (3), and (b)] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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33. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201, and 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit
34. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months / total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
35. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4360 and 40 CFR 60.4415(a)(1)(ii)] Federally Enforceable Through Title V Permit
36. The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
37. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NO_x, CO and O₂ concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080 and 4703, and 40 CFR 60.4335(b)(1)] Federally Enforceable Through Title V Permit
38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
39. The NO_x, CO and O₂ CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4, and/or 40 CFR 75 Appendix A, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
41. The owner/operator shall perform a relative accuracy test audit (RATA) for NO_x, CO and O₂ as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. [District Rule 1080] Federally Enforceable Through Title V Permit
42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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43. Results of the CEM system shall be averaged over a one hour period for NO_x emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [District Rule 4703, and 40 CFR 60.13 and 40 CFR 60.4350(a)] Federally Enforceable Through Title V Permit
44. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit
45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
46. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
47. Excess NO_x emissions shall be defined as any 30 day operating period in which the 30 day rolling average NO_x concentration exceeds an applicable emissions limit. A 30 day rolling average NO_x emission rate is the arithmetic average of all hourly NO_x emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NO_x emission rates for the preceding 30 unit operating days if a valid NO_x emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NO_x or O₂ (or both). [40 CFR 60.4350(h) and 40 CFR 60.4380(b)(1)] Federally Enforceable Through Title V Permit
48. For the purpose of determining excess NO_x emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NO_x emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O₂ concentration exceeds 19.0 percent O₂, a diluent cap value of 19 percent O₂ may be used in the emission calculations. [40 CFR 60.4350(b)] Federally Enforceable Through Title V Permit
49. Excess SO_x emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SO_x begins when a sample is not taken by its due date. A period of monitor downtime for SO_x also begins on the date and hour of a required sample, if invalid results are obtained. A period of SO_x monitoring downtime ends on the date and hour of the next valid sample. [40 CFR 60.4385(a) and (c)] Federally Enforceable Through Title V Permit
50. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NO_x emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080, and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit
51. The owner/operator shall submit to the District information correlating the NO_x control system operating parameters to the associated measured NO_x output. The information must be sufficient to allow the District to determine compliance with the NO_x emission limits of this permit during times that the CEMS is not functioning properly. [District Rule 4703] Federally Enforceable Through Title V Permit
52. The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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53. The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
54. The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit
55. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
56. This unit shall be equipped with temperature measurement devices that continuously measure both the hot and cold oxidation catalyst temperatures. [40 CFR 64] Federally Enforceable Through Title V Permit
57. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured hot oxidation catalyst temperature shall be equal to or greater than 950 degrees Fahrenheit and shall be less than or equal to 1100 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
58. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured cold oxidation catalyst temperature shall be equal to or greater than 450 degrees Fahrenheit and shall be less than or equal to 700 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
59. Upon detecting any excursion from the acceptable hot and/or cold oxidation catalyst temperature ranges, the owner/operator shall investigate the excursion and take corrective action to minimize excessive emissions and prevent the recurrence of the excursion as expeditiously as possible. [40 CFR 64] Federally Enforceable Through Title V Permit
60. The owner/operator shall keep records of the hot and cold oxidation catalyst temperatures and any maintenance/repairs performed on the temperature monitoring system. [40 CFR 64] Federally Enforceable Through Title V Permit
61. 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
62. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
63. 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 part 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
64. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit
65. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
67. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-4-5

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

471 HP CATERPILLAR MODEL 3456 DI TA AA DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A 300 KW ELECTRICAL GENERATOR

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 engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. 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
4. This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. {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]
6. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
7. NOx emissions shall not exceed 4.69 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CO emissions shall not exceed 0.12 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions shall not exceed 0.04 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 0.029 g/bhp-hr based on U.S EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
11. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702 and 17 CCR 93115] 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.

14. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
19. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
21. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
22. The permittee must collect and submit an annual report including location, dates and times of operation if the engine operates for more than 15 hours and up to 100 hours per year for emergency demand response. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
23. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-5-2

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

39 MMBTU/HR NATURAL GAS-FIRED ENGLISH BOILER AND TUBE INC MODEL 28D375 BOILER (S/N 31015) WITH AN ULTRA-LOW-NOX BURNER AND FLUE GAS RECIRCULATION

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. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The flue gas recirculation (FGR) system shall be operated properly and shall be maintained per the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. The fuel meter shall be calibrated per the fuel meter manufacturer's recommendations. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
5. The boiler shall operate a maximum of 4,000 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The boiler shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 6 .0 ppmvd @ 3% O₂ or 0.0073 lb/MMBtu; VOC (as methane) - 0.005 lb/MMBtu; CO - 50.0 ppmvd @ 3% O₂ or 0.037 lb/MMBtu; PM₁₀ - 0.007 lb/MMBtu; or SO_x (as SO₂) - 0.0019 lb/MMBtu. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
8. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] 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.

11. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute (or longer periods as necessary) test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months divided by the total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
21. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processors Association Standard 2377. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The minimum flue gas recirculation rate shall be established by source testing the unit per Rules 4305, 4306, and 4320 at three firing rates (low, mid, and high). The normal range shall be no lower than the minimum flue gas recirculation rate that complies with the NO_x and CO emission limits as demonstrated through source testing at a similar fire rate. The source test emission measurements shall be made with the unit operating at conditions representative of normal operations. No measurements shall be made within the first two hours after a continuous period in which fuel flow to the unit is shut off 30 minutes or longer, or within 30 minutes after a re-ignition as defined in District Rule 4306. A flow transmitter shall be calibrated prior to the source test. [District Rules 4305, 4306, and 4320] 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 normal flue gas recirculation rate or level shall be re-established during each source test required by the permit. The flow transmitter shall be calibrated prior to each source test. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Permittee shall continuously monitor and record the flue gas recirculation rate using a flow transmitter and the plant's CEM DAHS during period when this boiler is in use. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. If the flue gas recirculation rate is less than the normal range during periods of normal operation, permittee shall return the flue gas recirculation rate to the normal range as soon as possible, but no later than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range or level within 1 hour of operation after detection, permittee shall notify the District within the following 1 hour and shall conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the auxiliary boiler emission limits at the new flue gas recirculation rate. A district-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, permittee may stipulate that a violation has occurred and may be subject to enforcement action. Permittee shall correct the violation, demonstrate compliance has been re-established, and resume monitoring. If the deviations are the result of a qualifying breakdown condition pursuant to District Rule 1100, permittee may fully comply with District Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. Permittee shall keep records of the normal flue gas recirculation rate range established during source testing, the date and time of flue gas recirculation rate monitoring, and the measured flue gas recirculation rate and the firing rate at the time of the monitoring event. The records shall include a description of any corrective action taken to maintain the flue gas recirculation rate within the normal range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Owner/operator shall maintain daily records of the type and quantity of fuel combusted by the boiler. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
29. Owner/operator shall keep a record of the cumulative annual quantity of hours operated for this unit. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] 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-4597-6-2

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

235 BHP CUMMINS MODEL CFP7E-50 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER 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, 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 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
4. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 2.475 g-NOx/bhp-hr, 1.193 g-CO/bhp-hr, or 0.062 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed 0.111 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
8. 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 Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
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, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII] 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-4597-0-3

EXPIRATION DATE: 06/30/2019

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; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: MRP SAN JOAQUIN ENERGY, LLC
Location: 14950 W SCHULTE RD, TRACY COMBINED CYCLE POWER PLANT, TRACY, CA 95377
N-4597-0-3 : Feb 24 2020 11:14AM - BRARG

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. On August 31, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All equipment shall be maintained in proper operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
44. The permittee shall maintain records of the cumulative annual facility-wide NOx, VOC, and PM10 emissions. The records shall be updated daily. [District Rule 2201] Federally Enforceable Through Title V Permit
45. Should the facility, as defined in 40 CFR 68.3, become subject to part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR Part 70. [40 CFR Part 68, Subpart G] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-1-8

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #1 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-2)

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. Owner/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] Federally Enforceable Through Title V Permit
3. 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] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
6. Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater, except for up to three minutes in any hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
7. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve this gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During all types of operation, including startup and shutdown periods, ammonia injection in to the SCR system shall occur once a minimum catalyst face temperature of 435 degrees Fahrenheit has been reached. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201 and 40 CFR 60.4330(a)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO₂) - 8.10 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 3.90 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 1.13 lb/hr and 1.5 ppmvd @ 15% O₂; PM₁₀ - 4.40 lb/hr; or SOX (as SO₂) - 2.03 lb/hr. NOX (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703 and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
12. Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO₂) - 10.30 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 6.00 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 3.22 lb/hr and 2.0 ppmvd @ 15% O₂; PM₁₀ - 5.80 lb/hr; or SOX (as SO₂) - 2.63 lb/hr. NOX (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703 and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
13. During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NOX (as NO₂) - 390.5 lb/event; CO - 562.5 lb/event; VOC (as methane) - 10.5 lb/event; PM₁₀ - 11.0 lb/event; or SOX (as SO₂) - 4.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
14. During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NOX (as NO₂) - 104.0 lb/event; CO - 148.0 lb/event; VOC (as methane) - 2.6 lb/event; PM₁₀ - 3.0 lb/event; or SOX (as SO₂) - 1.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
15. A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the steady state lb/hr and ppmvd emission limits of this permit. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
16. The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
17. The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 2201 and 40 CFR 60.4333(a)] Federally Enforceable Through Title V Permit
19. The ammonia (NH₃) emissions shall not exceed 5 ppmvd @ 15% O₂ or 9.40 lb/hr over a 24 hour rolling average. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: $(\text{ppmvd @ 15\% O}_2) = ((a - (b \times c / 1,000,000)) \times (1,000,000 / b)) \times d$, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NO_x concentration ppmvd @ 15% O₂ across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; or 2.) Utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O₂. If this option is chosen, the owner/operator shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Daily emissions from the CTG shall not exceed the following limits: NOX (as NO₂) - 814.9 lb/day; CO - 1071.6 lb/day; VOC - 78.6 lb/day; PM₁₀ - 132.0 lb/day; or SOX (as SO₂) - 58.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NOX (as NO₂) - 88,881 lb/year; CO - 74,598 lb/year; VOC - 15,145 lb/year; PM₁₀ - 32,250 lb/year; or SOX (as SO₂) - 7,084 lb/year. Compliance with the annual NO_x and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM₁₀ and SO_x emission limits shall be demonstrated using the most recent source test results. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The combined natural gas fuel usage for permit units N-4597-1 and N-4597-2 shall not exceed 20,454 MMscf/year. [District Rule 2550] Federally Enforceable Through Title V Permit
26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOX, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to measure the steady state NOx, CO, VOC, and NH3 emission rates (lb/hr and ppmvd @ 15% O2) shall be conducted at least once every 12 months. [District Rules 1081, 2201 and 4703, 40 CFR 60.4340, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
28. Source testing to measure the PM10 emission rate (lb/hr) shall be conducted at least once every twelve months. [District Rule 1081, 2201 and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
29. Source testing to measure startup and shutdown NOx, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) at least once every seven years. CEM relative accuracy for NOx and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NOx and CO startup emission limits, then startup and shutdown NOx and CO testing shall be conducted every 12 months. If an annual startup and shutdown NOx and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NOx and CO testing frequency shall return to the once every seven years schedule. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
30. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [District Rule 4703] Federally Enforceable Through Title V Permit
31. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following test methods shall be used: NOx - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM10 - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O2 - EPA Method 3, 3A, or 20 or ARB 100. NOx testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703 and 40 CFR 60.4400(1)(i) and 40 CFR 60.4400(a)(2), (3), and (b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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33. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201 and 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit
34. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: $12\text{-month rolling average fuel sulfur content} = \text{Sum of the monthly average fuel sulfur contents for the previous 12 months} / \text{total number of months the unit has operated in during the previous 12 months}$. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
35. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4415(a)(1)(i)] Federally Enforceable Through Title V Permit
36. The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
37. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOX, CO and O2 concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080 and 4703] Federally Enforceable Through Title V Permit
38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
39. The NOX, CO and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4, and/or 40 CFR 75 Appendix A, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
41. The owner/operator shall perform a relative accuracy test audit (RATA) for NOX, CO and O2 as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. [District Rule 1080] Federally Enforceable Through Title V Permit
42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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43. Results of the CEM system shall be averaged over a one hour period for NOX emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [District Rule 4703 and 40 CFR 60.13 and 40 CFR 60.4350(a)] Federally Enforceable Through Title V Permit
44. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit
45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
46. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
47. Excess NOx emissions shall be defined as any 30 day operating period in which the 30 day rolling average NOx concentration exceeds an applicable emissions limit. A 30 day rolling average NOx emission rate is the arithmetic average of all hourly NOx emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NOx emission rates for the preceding 30 unit operating days if a valid NOx emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.4350(h) and 40 CFR 60.4380(b)(1)] Federally Enforceable Through Title V Permit
48. For the purpose of determining excess NOx emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NOx emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O2 concentration exceeds 19.0 percent O2, a diluent cap value of 19 percent O2 may be used in the emission calculations. [40 CFR 60.4350(b)] Federally Enforceable Through Title V Permit
49. Excess SOx emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SOx begins when a sample is not taken by its due date. A period of monitor downtime for SOx also begins on the date and hour of a required sample, if invalid results are obtained. A period of SOx monitoring downtime ends on the date and hour of the next valid sample. [40 CFR 60.4385(a) and (c)] Federally Enforceable Through Title V Permit
50. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080 and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit
51. The owner/operator shall submit to the District information correlating the NOX control system operating parameters to the associated measured NOX output. The information must be sufficient to allow the District to determine compliance with the NOX emission limits of this permit during times that the CEMS is not functioning properly. [District Rule 4703] Federally Enforceable Through Title V Permit
52. The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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53. The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
54. The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit
55. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
56. This unit shall be equipped with temperature measurement devices that continuously measure both the hot and cold oxidation catalyst temperatures. [40 CFR 64] Federally Enforceable Through Title V Permit
57. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured hot oxidation catalyst temperature shall be equal to or greater than 950 degrees Fahrenheit and shall be less than or equal to 1100 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
58. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured cold oxidation catalyst temperature shall be equal to or greater than 450 degrees Fahrenheit and shall be less than or equal to 700 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
59. Upon detecting any excursion from the acceptable hot and/or cold oxidation catalyst temperature ranges, the owner/operator shall investigate the excursion and take corrective action to minimize excessive emissions and prevent the recurrence of the excursion as expeditiously as possible. [40 CFR 64] Federally Enforceable Through Title V Permit
60. The owner/operator shall keep records of the hot and cold oxidation catalyst temperatures and any maintenance/repairs performed on the temperature monitoring system. [40 CFR 64] Federally Enforceable Through Title V Permit
61. 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
62. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
63. 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 part 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
64. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit
65. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
67. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-2-8

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #2 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-1)

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. Owner/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] Federally Enforceable Through Title V Permit
3. 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] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
6. Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater, except for up to three minutes in any hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
7. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve this gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During all types of operation, including startup and shutdown periods, ammonia injection in to the SCR system shall occur once a minimum catalyst face temperature of 435 degrees Fahrenheit has been reached. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201 and 40 CFR 60.4330(a)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO₂) - 8.10 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 3.90 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 1.13 lb/hr and 1.5 ppmvd @ 15% O₂; PM₁₀ - 4.40 lb/hr; or SOX (as SO₂) - 2.03 lb/hr. NOX (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703 and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
12. Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO₂) - 10.30 lb/hr and 2.0 ppmvd @ 15% O₂; CO - 6.00 lb/hr and 2.0 ppmvd @ 15% O₂; VOC (as methane) - 3.22 lb/hr and 2.0 ppmvd @ 15% O₂; PM₁₀ - 5.80 lb/hr; or SOX (as SO₂) - 2.63 lb/hr. NOX (as NO₂) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703 and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit
13. During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NOX (as NO₂) - 390.5 lb/event; CO - 562.5 lb/event; VOC (as methane) - 10.5 lb/event; PM₁₀ - 11.0 lb/event; or SOX (as SO₂) - 4.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
14. During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NOX (as NO₂) - 104.0 lb/event; CO - 148.0 lb/event; VOC (as methane) - 2.6 lb/event; PM₁₀ - 3.0 lb/event; or SOX (as SO₂) - 1.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
15. A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the steady state lb/hr and ppmvd emission limits of this permit. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
16. The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
17. The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 2201 and 40 CFR 60.4333(a)] Federally Enforceable Through Title V Permit
19. The ammonia (NH₃) emissions shall not exceed 5 ppmvd @ 15% O₂ or 9.40 lb/hr over a 24 hour rolling average. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: $(\text{ppmvd @ 15\% O}_2) = ((a - (b \times c / 1,000,000)) \times (1,000,000 / b)) \times d$, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NO_x concentration ppmvd @ 15% O₂ across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; or 2.) Utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O₂. If this option is chosen, the owner/operator shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Daily emissions from the CTG shall not exceed the following limits: NOX (as NO₂) - 814.9 lb/day; CO - 1071.6 lb/day; VOC - 78.6 lb/day; PM₁₀ - 132.0 lb/day; or SOX (as SO₂) - 58.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NOX (as NO₂) - 88,881 lb/year; CO - 74,598 lb/year; VOC - 15,145 lb/year; PM₁₀ - 32,250 lb/year; or SOX (as SO₂) - 7,084 lb/year. Compliance with the annual NO_x and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM₁₀ and SO_x emission limits shall be demonstrated using the most recent source test results. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The combined natural gas fuel usage for permit units N-4597-1 and N-4597-2 shall not exceed 20,454 MMscf/year. [District Rule 2550] Federally Enforceable Through Title V Permit
26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOX, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to measure the steady state NOx, CO, VOC, and NH3 emission rates (lb/hr and ppmvd @ 15% O2) shall be conducted at least once every twelve months. [District Rules 1081, 2201 and 4703 and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
28. Source testing to measure the PM10 emission rate (lb/hr) shall be conducted at least once every twelve months. [District Rule 1081, 2201 and 40 CFR 60.4400] Federally Enforceable Through Title V Permit
29. Source testing to measure startup and shutdown NOx, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) at least once every seven years. CEM relative accuracy for NOx and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NOx and CO startup emission limits, then startup and shutdown NOx and CO testing shall be conducted every 12 months. If an annual startup and shutdown NOx and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NOx and CO testing frequency shall return to the once every seven years schedule. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
30. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [District Rule 4703] Federally Enforceable Through Title V Permit
31. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following test methods shall be used: NOx - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM10 - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O2 - EPA Method 3, 3A, or 20 or ARB 100. NOx testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703 and 40 CFR 60.4400(1)(i) and 40 CFR 60.4400(a)(2), (3), and (b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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33. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201 and 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit
34. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months / total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
35. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4415(a)(1)(i)] Federally Enforceable Through Title V Permit
36. The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
37. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOX, CO and O2 concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080 and 4703 and 40 CFR 60.4335(b)(1)] Federally Enforceable Through Title V Permit
38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
39. The NOX, CO and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4, and/or 40 CFR 75 Appendix A, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
40. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
41. The owner/operator shall perform a relative accuracy test audit (RATA) for NOX, CO and O2 as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. [District Rule 1080] Federally Enforceable Through Title V Permit
42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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43. Results of the CEM system shall be averaged over a one hour period for NOX emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [District Rule 4703 and 40 CFR 60.13 and 40 CFR 60.4350(a)] Federally Enforceable Through Title V Permit
44. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit
45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
46. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
47. Excess NOx emissions shall be defined as any 30 day operating period in which the 30 day rolling average NOx concentration exceeds an applicable emissions limit. A 30 day rolling average NOx emission rate is the arithmetic average of all hourly NOx emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NOx emission rates for the preceding 30 unit operating days if a valid NOx emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.4350(h) and 40 CFR 60.4380(b)(1)] Federally Enforceable Through Title V Permit
48. For the purpose of determining excess NOx emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NOx emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O2 concentration exceeds 19.0 percent O2, a diluent cap value of 19 percent O2 may be used in the emission calculations. [40 CFR 60.4350(b)] Federally Enforceable Through Title V Permit
49. Excess SOx emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SOx begins when a sample is not taken by its due date. A period of monitor downtime for SOx also begins on the date and hour of a required sample, if invalid results are obtained. A period of SOx monitoring downtime ends on the date and hour of the next valid sample. [40 CFR 60.4385(a) and (c)] Federally Enforceable Through Title V Permit
50. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080 and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit
51. The owner/operator shall submit to the District information correlating the NOX control system operating parameters to the associated measured NOX output. The information must be sufficient to allow the District to determine compliance with the NOX emission limits of this permit during times that the CEMS is not functioning properly. [District Rule 4703] Federally Enforceable Through Title V Permit
52. The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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53. The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
54. The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit
55. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
56. This unit shall be equipped with temperature measurement devices that continuously measure both the hot and cold oxidation catalyst temperatures. [40 CFR 64] Federally Enforceable Through Title V Permit
57. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured hot oxidation catalyst temperature shall be equal to or greater than 950 degrees Fahrenheit and shall be less than or equal to 1100 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
58. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured cold oxidation catalyst temperature shall be equal to or greater than 450 degrees Fahrenheit and shall be less than or equal to 700 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit
59. Upon detecting any excursion from the acceptable hot and/or cold oxidation catalyst temperature ranges, the owner/operator shall investigate the excursion and take corrective action to minimize excessive emissions and prevent the recurrence of the excursion as expeditiously as possible. [40 CFR 64] Federally Enforceable Through Title V Permit
60. The owner/operator shall keep records of the hot and cold oxidation catalyst temperatures and any maintenance/repairs performed on the temperature monitoring system. [40 CFR 64] Federally Enforceable Through Title V Permit
61. 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
62. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
63. 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 part 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
64. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit
65. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit
66. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit
67. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-4-4

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

471 HP CATERPILLAR MODEL 3456 DI TA AA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 300 KW ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
2. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
4. 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
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
6. The exhaust stack(s) shall not be fitted with a fixed rain cap or any similar device that would impede upward vertical exhaust flow during operation. [District Rule 4102]
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] Federally Enforceable Through Title V Permit
8. NOx emissions shall not exceed 4.69 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. CO emissions shall not exceed 0.12 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC emissions shall not exceed 0.04 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions shall not exceed 0.029 g/bhp-hr based on U.S EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
12. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
19. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
21. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
22. On and after January 1, 2015, the permittee must collect and submit an annual report including location, dates and times of operation if the engine operates for more than 15 hours and up to 100 hours per year for emergency demand response. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
23. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4597-5-1

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

39 MMBTU/HR NATURAL GAS-FIRED ENGLISH BOILER AND TUBE INC MODEL 28D375 BOILER (S/N 31015) WITH AN ULTRA-LOW-NOX BURNER AND FLUE GAS RECIRCULATION

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. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The flue gas recirculation (FGR) system shall be operated properly and shall be maintained per the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. The fuel meter shall be calibrated per the fuel meter manufacturers recommendations. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
5. The boiler shall operate a maximum of 4,000 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The boiler shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 6 .0 ppmvd @ 3% O₂ or 0.0073 lb/MMBtu; VOC (as methane) - 0.005 lb/MMBtu; CO - 50.0 ppmvd @ 3% O₂ or 0.037 lb/MMBtu; PM₁₀ - 0.007 lb/MMBtu; or SO_x (as SO₂) - 0.0019 lb/MMBtu. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
8. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute (or longer periods as necessary) test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. NOX emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months divided by the total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
19. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The minimum flue gas recirculation rate shall be established by source testing the unit per Rules 4305, 4306, and 4320 at three firing rates (low, mid, and high). The normal range shall be no lower than the minimum flue gas recirculation rate that complies with the NOx and CO emission limits as demonstrated through source testing at a similar fire rate. The source test emission measurements shall be made with the unit operating at conditions representative of normal operations. No measurements shall be made within the first two hours after a continuous period in which fuel flow to the unit is shut off 30 minutes or longer, or within 30 minutes after a re-ignition as defined in District Rule 4306. A flow transmitter shall be calibrated prior to the source test. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. The normal flue gas recirculation rate or level shall be re-established during each source test required by the permit. The flow transmitter shall be calibrated prior to each source test. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. Permittee shall continuously monitor and record the flue gas recirculation rate using a flow transmitter and the plant's CEM DAHS during period when this boiler is in use. [District Rules 4305, 4306, and 4320] 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. If the flue gas recirculation rate is less than the normal range during periods of normal operation, permittee shall return the flue gas recirculation rate to the normal range as soon as possible, but no later than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range or level within 1 hour of operation after detection, permittee shall notify the District within the following 1 hour and shall conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the auxiliary boiler emission limits at the new flue gas recirculation rate. A district-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, permittee may stipulate that a violation has occurred and may be subject to enforcement action. Permittee shall correct the violation, demonstrate compliance has been re-established, and resume monitoring. If the deviations are the result of a qualifying breakdown condition pursuant to District Rule 1100, permittee may fully comply with District Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Permittee shall keep records of the normal flue gas recirculation rate range established during source testing, the date and time of flue gas recirculation rate monitoring, and the measured flue gas recirculation rate and the firing rate at the time of the monitoring event. the records shall include a description of any corrective action taken to maintain the flue gas recirculation rate within the normal range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NO_x, CO, and O₂ analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
26. Owner/operator shall maintain daily records of the type and quantity of fuel combusted by the boiler. [District Rules 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
27. Owner/operator shall keep a record of the cumulative annual quantity of hours operated for this unit. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] 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-4597-6-1

EXPIRATION DATE: 06/30/2019

EQUIPMENT DESCRIPTION:

235 BHP CUMMINS MODEL CFP7E-50 TIER 3 DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER 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, 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, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
4. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 2.475 g-NOx/bhp-hr, 1.193 g-CO/bhp-hr, or 0.062 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed 0.111 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
8. 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", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115, 40 CFR 60 Subpart IIII, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
9. The owner/operator 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, and the purpose of the operation (for example: load testing, weekly testing, emergency firefighting, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Equipment Listing

Detailed Facility Report
For Facility=4597 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

MRP SAN JOAQUIN ENERGY, LLC		FAC #	N 4597	TYPE:	TitleV	EXPIRE ON:	06/30/2019
14950 W SCHULTE RD		STATUS:	A	TOXIC ID:	70165	AREA:	4 /
TRACY COMBINED CYCLE POWER PLANT		TELEPHONE:				INSP. DATE:	02/20
TRACY, CA 95377							

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-4597-1-8	158,500 KW	3020-08B H	1	15,843.00	15,843.00	A	88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #1 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-2)
N-4597-2-8	168,500 KW	3020-08B H	1	15,843.00	15,843.00	A	88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #2 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-1)
N-4597-4-4	471 hp	3020-10 D	1	577.00	577.00	A	471 HP CATERPILLAR MODEL 3456 DI TA AA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 300 KW ELECTRICAL GENERATOR
N-4597-5-1	39 MMBtu/hr	3020-02 H	1	1,238.00	1,238.00	A	39 MMBTU/HR NATURAL GAS-FIRED ENGLISH BOILER AND TUBE INC MODEL 28D375 BOILER (S/N 31015) WITH AN ULTRA-LOW-NOX BURNER AND FLUE GAS RECIRCULATION
N-4597-6-1	235 BHP	3020-10 C	1	290.00	290.00	A	235 BHP CUMMINS MODEL CFP7E-50 TIER 3 DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

Number of Facilities Reported: 1

ATTACHMENT D

District's Response to
Facility's Comments

MRP San Joaquin Energy LLC's Requested Modifications and District Responses:

The District received the following two comments from MRP San Joaquin Energy LLC on February 3, 2020 that are listed below along with the District's responses.

Comment #1

Our request to revise condition 35 of permits N-4597-1-8 and N-4597-2-8 to add method D5504 was accepted, and condition 35 was revised, but condition 19 of Permit N-4597-5-1 was not revised citing Rule 2201. Can you provide the specific requirement of Rule 2201 the precludes you from making this revision?

Since there is only one pipe coming into the facility that supplies our natural gas, we only need to test the natural gas one time and it would apply to all the units. However, using method D5504 (Gas chromatography) which is a more accurate method and many labs use it, can only be used for units N-4597-1-8 and N-4597-2-8, we still would have to use the less accurate methods for the auxiliary boiler and we would not be able to take advantage of using D5504 thus using two separate tests and incurring twice the cost. Is it possible to make this change (Add method D5504) to unit N-4597-5-1 condition 19 using an administrative change?

Permit N-4597-5-1, Condition 19, states the following:

- Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processor Association Standard 2377. [District Rule 2201]

District's Response to Comment #1

Since there is no change in the method of operation with the addition of a new test method to the permit condition, it is not subject to District Rule 2201. The District has revised condition 21 to add D5504 as one of the approved test methods that can be used to determine sulfur content of the natural gas to be fired in the auxiliary boiler. The following updated condition will be placed on draft permit N-4597-5-2:

- Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processor Association Standard 2377. [District Rule 2201]

Comment #2

The reporting periods for the Report of Required Monitoring and the Compliance Certification Report in Condition 41 in the Facility Wide Permit N-4597-0-4 was changed to begin July 1 of every year instead of January 1 of every year as stated in the current permit N-4597-0-3. Is there a reason for this change?

District's Response to Comment #2

The reporting periods of July 1 on draft permit N-4597-0-4 was changed in error and has been corrected to January 1 as on the current Title V permit. The following updated condition will be placed as condition 41 on draft permit N-4597-0-4.

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